# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

CHRISTOPHER META,	
Plaintiff,	) CASE NO. 4:14-CV-0832
v.	) JUDGE DONALD C. NUGENT
TARGET CORP., et al.	)
Defendants.	)
	)
	)
	)

# DECLARATION OF JEANNE C. FINEGAN, APR CONCERNING IMPLEMENTATION OF CLASS MEMBER NOTIFICATION PROGRAM

I, JEANNE C. FINEGAN declare as follows:

### <u>INTRODUCTION</u>

- 1. I am President and Chief Media Officer of HF Media, LLC, Inc. ("HF") a division of Heffler Claims Group LLC ("Heffler"). This Declaration is based upon my personal knowledge as well as information provided to me by my associates and staff, including information reasonably relied upon in the fields of advertising media and communications.
- 2. Pursuant to the Settlement Agreement Paragraph 7.b., Heffler was engaged by Defendants Nice-Pak Products, Inc. and Target Corp., with the consent of Plaintiffs, to develop and implement a media notice program as part of the parties' proposed class action settlement. This task has been successfully accomplished.
- 3. I submit this Declaration in order to provide the Court and the parties to the Action a report regarding the successful implementation of the Notice Program as it relates only to the Publication and Internet/Media Notice portion (herein referred to for simplicity as "Media Notice"), and the overall reach of the Notice Program in accordance with the Court's Order.

- 4. This Declaration explains how this Notice Program is estimated to have reached¹ approximately 75 percent of the target audience with an average frequency of 2.8 times (even before considering the additional audience delivery of earned media resulting from more than 227 news mentions). Further, the social outreach was considerable with over 4,388 engagements² across Facebook and Instagram. Also, I am informed by the Administrator that the direct email/mail efforts alone reached an estimated 48 percent of the class.
- 5. As described more fully below, the Notice Plan was successfully and timely implemented. In compliance with the Court's Order, the Notice Plan commenced on May 4, 2018 and was substantially completed by June 3, 2018.

#### **QUALIFICATIONS**

- 6. A comprehensive description of my credentials and experience that qualify me to provide expert opinions on the adequacy of class action notice programs was previously filed with this Court on March 29, 2018. In summary, I have served as an Expert, directly responsible for the design and implementation of over 1,000 legal notice programs, including Federal Trade Commission Enforcement actions, some of which are the largest and most complex programs ever filed in both the United States and Canada.
- 7. My work as an Expert includes a wide range of class actions and regulatory and consumer matters that include product liability, construction defect, antitrust, asbestos, medical pharmaceutical, human rights, civil rights, telecommunications, media, environmental, securities, banking, insurance and bankruptcy.
- 8. Further, I have been at the forefront of modern notice, including plain language as noted in a RAND study<sup>3</sup>, and importantly, integrating digital media and social

<sup>&</sup>lt;sup>1</sup> Net Reach measures the number of people exposed (unduplicated), and Frequency is a report of the number of exposures. In advertising, this is commonly referred to as a "Reach and Frequency" analysis, where "Reach" refers to the estimated percentage of the unduplicated audience exposed to the campaign, and "Frequency" refers to how many times, on average, the target audience had the opportunity to see the message. The calculations are used by advertising and communications firms worldwide and have become a critical element to help provide the basis for determining adequacy of notice in class actions.

<sup>&</sup>lt;sup>2</sup> A social engagement is an interaction with a post or an ad such as a like a share or a comment.

<sup>&</sup>lt;sup>3</sup> Deborah R. Hensler, et al., Class Action Dilemmas, Pursuing Public Goals for Private Gain (Rand 2000).

media into court-approved legal notice programs such as:

- Carter v Forjas Taurus S.S., Taurus International Manufacturing, Inc., Case No. 1:13-CV-24583 PAS (S.D. Fl. 2016);
- In re: Blue Buffalo Marketing and Sales Practices Litigation, No. 14-md-02562-RWS (E.D. Mo. 2016);
- *In re: TracFone Unlimited Service Plan Litigation*, No. C-13-3440 EMC (N.D.CA 2015); and
- In re: Skechers Toning Shoes Products Liability Litigation, No. 3:11-MD-2308-TBR (W.D. Ky. 2012).
- 9. In evaluating the adequacy and effectiveness of my notice programs, courts have repeatedly recognized my work as an Expert. For example, in:
  - a. *Carter v Forjas Taurus S.S.*, *Taurus International Manufacturing*, *Inc.*, Case No. 1:13-CV-24583 PAS (S.D. Fl. 2016). In her Final Order and Judgment Granting Plaintiffs Motion for Final Approval of Class Action Settlement, the Honorable Patricia Seitz stated:

"The Court considered the extensive experience of Jeanne C. Finegan and the notice program she developed. ... There is no national firearms registry and Taurus sale records do not provide names and addresses of the ultimate purchasers... Thus the form and method used for notifying Class Members of the terms of the Settlement was the best notice practicable. ... The court-approved notice plan used peer-accepted national research to identify the optimal traditional, online, mobile and social media platforms to reach the Settlement Class Members."

10. Additionally, on January 20, 2016, Transcript of Class Notice Hearing, p. 5 Judge Seitz, gave accolades to Ms. Finegan, noting:

"I would like to compliment Ms. Finegan and her company because I was quite impressed with the scope and the effort of communicating with the Class."

(a) In Re: Blue Buffalo Company, Ltd., Marketing and Sales Practices Litigation, Case No. 4:14-MD-2562 RWS (E.D. Mo. 2015) (Hearing for Final Approval, May 19, 2016 transcript p. 49). During the Hearing for Final Approval, the Honorable Rodney Sippel said:

"It is my finding that notice was sufficiently provided to class members in the manner directed in my preliminary approval order and that notice met all applicable requirements of due process and any other applicable law and considerations."

- (b) *In re: Skechers Toning Shoes Products Liability Litigation*, No. 3:11-MD-2308-TBR (W.D. Ky. 2012). In his Final Order and Judgment granting the Motion for Preliminary Approval of Settlement, the Honorable Thomas B. Russell stated:
  - "... The comprehensive nature of the class notice leaves little doubt that, upon receipt, class members will be able to make an informed and intelligent decision about participating in the settlement."
- (c) *Quinn v. Walgreen Co., Wal-Mart Stores Inc.,* **7:12** CV-8187-VB (NYSD) (Jt Hearing for Final App, March. 5, 2015, transcript page 40-41). During the Hearing on Final Approval of Class Action, the Honorable Vincent L. Briccetti gave accolades to Ms. Finegan, noting:

"The notice plan was the best practicable under the circumstances. ... [and] the proof is in the pudding. ... So, the notice has reached a lot of people and a lot of people have made claims."

11. A comprehensive description of my credentials is attached as **Exhibit A**.

## MEDIA NOTICE PROGRAM SUMMARY

12. The notice program included Direct E-mail and first-class U.S. Mail to Class Members, and CAFA Notice to appropriate state and federal government officials. Complete details of the direct notice program are found in the Declaration of the Notice Administrator.

- 13. The Media Notice Program included the following elements:
  - Online display banner advertising specifically targeted to reach Class Members;
  - A press release (U.S.1 Newsline);
  - Social media through Facebook, Instagram;
  - An informational website, www.upandupwipessettlement.com, on which the notices and other important Court documents have been posted; and
  - A toll-free information line, 888-878-1989, by which Class Members can call 24/7 for more information about the Settlement, including, but not limited to, requesting copies of the Long Form Notice or Claim Form. \*Complete details of the toll-free number and website are found in the Declaration of the Settlement Administrator.

#### **MEDIA NOTICE - INTERNET**

- 14. In compliance with the Court's Order, more than 49,000,000 valid<sup>4</sup> targeted impressions were served on a custom whitelist of comScore top 3,000 sites plus a premium whitelist of parenting specific sites, as well as Facebook and Instagram.
- 15. HF Media incorporated the most cutting edge data and technology to appropriately deliver ads to target parents who shop at Target with children who are 6 to 12 years of age. Further, the notice program included social media platforms Facebook and Instagram. The social media newsfeed ads targeted followers of Target's Facebook page who are also parents. The program also included retargeting, or reminders to those who visit the settlement website, but did not complete a claim. The social outreach was considerable with over 4,388 social engagements across Facebook and Instagram. Attached as **Exhibit B** are screen shots of the digital display ads, and Facebook and Instagram ads.

## **PRESS RELEASE**

- 16. A news release was issued over PR Newswire's U.S. 1 Newsline at 9:17 a.m. Eastern, on May 4, 2018.
  - 17. HF Media monitored the various media channels for subsequent news

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<sup>&</sup>lt;sup>4</sup> HF Media employed Integral Ad Science ("IAS") to actively monitor the digital notice program ads for Fraudulent Non-Human Bot traffic. The active management identified less than 1% invalid impressions, which have been culled from the final reach calculations.

articles and various social mentions as a result of the press release efforts. Attached as **Exhibit C** is a detailed report listing over 227 news mentions which occurred as a result of the issuance of the press release.

### **CONCLUSION**

- 18. In my opinion, the outreach efforts described above reflect a particularly appropriate, highly targeted and contemporary way to employ notice to this class. Through a multi-media channel approach to notice, which employed direct notice, digital, social and mobile media, an estimated 75 percent of targeted Class Members were reached by the media program, on average, 2.8 times. In my opinion, the efforts used in this notice program are of the highest modern communication standards, are reasonably calculated to provide notice, and are consistent with best practicable court-approved notice programs in similar matters and the Federal Judicial Center's guidelines concerning appropriate reach.
- 19. I declare under the penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct. Executed on July 25, 2018 in Tigard, Oregon.

Jeanne C. Finegan, APR

# Exhibit A



# **JEANNE C. FINEGAN, APR**

#### **BIOGRAPHY**



Jeanne Finegan, APR, is President and Chief Media Officer of HF Media, LLC. (a division of Heffler Claims Group), named by *Diversity Journal* as one of the "Top 100 Women Worth Watching," has more than 30 years of communications and advertising experience and is a distinguished legal notice and communications expert. During her tenure, she has planned and implemented over 1,000 high-profile, complex legal notice communication programs. She is a recognized notice expert in both the United States and in Canada, with extensive international notice

experience spanning more than 140 countries and over 40 languages.

Ms. Finegan has lectured, published and has been cited extensively on various aspects of legal noticing, product recall and crisis communications. She has served the Consumer Product Safety Commission (CPSC) as an expert to determine ways in which the Commission can increase the effectiveness of its product recall campaigns. Further, she has planned and implemented large-scale government enforcement notice programs for the Federal Trade Commission (FTC) and the Securities and Exchange Commission (SEC). More recently, she has been extensively involved as a contributing author for "Guidelines and Best Practices Implementing 2018 Amendments to Rule 23 Class Action Settlement Provisions" to be published by Duke University School of Law in 2018. Further, she has worked with the Special Settlement Administrator's team to assist with the outreach strategy for the historic Auto Airbag Settlement, In re: Takata Airbag Products Liability Litigation MDL 2599.

Ms. Finegan is accredited in Public Relations (APR) by the Universal Accreditation Board, which is a program administered by the Public Relations Society of America (PRSA), and is also a recognized member of the Canadian Public Relations Society (CPRS). She has served on examination panels for APR candidates and worked *pro bono* as a judge for prestigious PRSA awards.

Ms. Finegan has provided expert testimony before Congress on issues of notice, and expert testimony in both state and federal courts regarding notification campaigns. She has conducted numerous media audits of proposed notice programs to assess the adequacy of those programs under Fed R. Civ. P. 23(c)(2) and similar state class action statutes.

She was an early pioneer of plain language in notice (as noted in a RAND study,<sup>1</sup>) and continues to set the standard for modern outreach as the first notice expert to integrate social and mobile media into court approved legal notice programs.

<sup>1</sup> Deborah R. Hensler et al., CLASS ACTION DILEMAS, PURSUING PUBLIC GOALS FOR PRIVATE GAIN. RAND (2000).



In the course of her class action experience, courts have recognized the merits of, and admitted expert testimony based on, her scientific evaluation of the effectiveness of notice plans. She has designed legal notices for a wide range of class actions and consumer matters that include product liability, construction defect, antitrust, medical/pharmaceutical, human rights, civil rights, telecommunication, media, environment, government enforcement actions, securities, banking, insurance, mass tort, restructuring and product recall.

#### **JUDICIAL COMMENTS AND LEGAL NOTICE CASES**

In evaluating the adequacy and effectiveness of Ms. Finegan's notice campaigns, courts have repeatedly recognized her excellent work. The following excerpts provide some examples of such judicial approval.

Carter v Forjas Taurus S.S., Taurus International Manufacturing, Inc., Case No. 1:13-CV-24583 PAS (S.D. Fl. 2016). In her Final Order and Judgment Granting Plaintiffs Motion for Final Approval of Class Action Settlement, the Honorable Patricia Seitz stated:

The Court considered the extensive experience of Jeanne C. Finegan and the notice program she developed. ...There is no national firearms registry and Taurus sale records do not provide names and addresses of the ultimate purchasers... Thus the form and method used for notifying Class Members of the terms of the Settlement was the best notice practicable. ...The court-approved notice plan used peer-accepted national research to identify the optimal traditional, online, mobile and social media platforms to reach the Settlement Class Members.

Additionally, in January 20, 2016, Transcript of Class Notice Hearing, p. 5 Judge Seitz, gave accolades to Ms. Finegan, noting:

I would like to compliment Ms. Finegan and her company because I was quite impressed with the scope and the effort of communicating with the Class.

**Cook et. al v. Rockwell International Corp. and the Dow Chemical Co.,** No. 90-cv-00181- KLK (D.Colo. 2017)., aka, Rocky Flats Nuclear Weapons Plant Contamination. In the Order Granting Final Approval, dated April 28, 2017, p.3, the Honorable John L. Kane said:

The Court-approved Notice Plan, which was successfully implemented by [HF Media- emphasis added] (see Doc. 2432), constituted the best notice practicable under the circumstances. In making this determination, the Court finds that the Notice Plan that was implemented, as set forth in Declaration of Jeanne C. Finegan, APR Concerning Implementation and Adequacy of Class Member Notification (Doc. 2432), provided for individual notice to all members of the Class whose identities and addresses were identified through reasonable efforts, ... and a comprehensive national publication notice program that included, inter alia, print, television, radio and



internet banner advertisements. ...Pursuant to, and in accordance with, Rule 23 of the Federal Rules of Civil Procedure, the Court finds that the Notice Plan provided the best notice practicable to the Class.

Warner et al. v. Toyota Motor Sales, U.S.A. Inc., Case No 2:15-cv-02171-FMO FFMx (C.D. Cal. 2017). In the Order Re: Final Approval of Class Action Settlement; Approval of Attorney's Fees, Costs & Service Awards, dated May 21, 2017, the Honorable Fernanedo M. Olguin stated:

Finegan, the court-appointed settlement notice administrator, has implemented the mutliprong notice program. ...the court finds that the class notice and the notice process fairly and adequately informed the class members of the nature of the action, the terms of the proposed settlement, the effect of the action and release of claims, the class members' right to exclude themselves from the action, and their right to object to the proposed settlement. (See Dkt. 98, PAO at 25-28).

Michael Allagas, et al., v. BP Solar International, Inc., et al., BP Solar Panel Settlement, Case No. 3:14-cv-00560- SI (N.D. Cal., San Francisco Div. 2016). In the Order Granting Final Approval, Dated December 22, 2016, The Honorable Susan Illston stated:

Class Notice was reasonable and constituted due, adequate and sufficient notice to all persons entitled to be provided with notice; and d. fully satisfied the requirements of the Federal Rules of Civil Procedure, including Fed. R. Civ. P. 23(c)(2) and (e), the United States Constitution (including the Due Process Clause), the Rules of this Court, and any other applicable law.

*In re: Skechers Toning Shoes Products Liability Litigation,* No. 3:11-MD-2308-TBR (W.D. Ky. 2012). In his Final Order and Judgment granting the Motion for Preliminary Approval of Settlement, the Honorable Thomas B. Russell stated:

... The comprehensive nature of the class notice leaves little doubt that, upon receipt, class members will be able to make an informed and intelligent decision about participating in the settlement.

**Brody v. Merck & Co., Inc., et al,** No. 3:12-cv-04774-PGS-DEA (N.J.) (Jt Hearing for Prelim App, Sept. 27, 2012, transcript page 34). During the Hearing on Joint Application for Preliminary Approval of Class Action, the Honorable Peter G. Sheridan praised Ms. Finegan, noting:

Ms. Finegan did a great job in testifying as to what the class administrator will do. So, I'm certain that all the class members or as many that can be found, will be given some very adequate notice in which they can perfect their claim.



**Quinn v. Walgreen Co., Wal-Mart Stores Inc.,** 7:12 CV-8187-VB (NYSD) (Jt Hearing for Final App, March. 5, 2015, transcript page 40-41). During the Hearing on Final Approval of Class Action, the Honorable Vincent L. Briccetti gave accolades to Ms. Finegan, noting:

"The notice plan was the best practicable under the circumstances. ... [and] "the proof is in the pudding. This settlement has resulted in more than 45,000 claims which is 10,000 more than the Pearson case and more than 40,000 more than in a glucosamine case pending in the Southern District of California I've been advised about. So the notice has reached a lot of people and a lot of people have made claims."

*In Re: TracFone Unlimited Service Plan Litigation,* No. C-13-3440 EMC (ND Ca). In the Final Order and Judgment Granting Class Settlement, July 2, 2015, the Honorable Edward M. Chen noted:

"...[D]epending on the extent of the overlap between those class members who will automatically receive a payment and those who filed claims, the total claims rate is estimated to be approximately 25-30%. This is an excellent result...

*In Re: Blue Buffalo Company, Ltd., Marketing and Sales Practices Litigation*, Case No. 4:14-MD-2562 RWS (E.D. Mo. 2015), (Hearing for Final Approval, May 19, 2016 transcript p. 49). During the Hearing for Final Approval, the Honorable Rodney Sippel said:

It is my finding that notice was sufficiently provided to class members in the manner directed in my preliminary approval order and that notice met all applicable requirements of due process and any other applicable law and considerations.

**DeHoyos, et al. v. Allstate Ins. Co.**, No. SA-01-CA-1010 (W.D.Tx. 2001). In the Amended Final Order and Judgment Approving Class Action Settlement, the Honorable Fred Biery stated:

[T]he undisputed evidence shows the notice program in this case was developed and implemented by a nationally recognized expert in class action notice programs. ... This program was vigorous and specifically structured to reach the African-American and Hispanic class members. Additionally, the program was based on a scientific methodology which is used throughout the advertising industry and which has been routinely embraced routinely [sic] by the Courts. Specifically, in order to reach the identified targets directly and efficiently, the notice program utilized a multi-layered approach which included national magazines; magazines specifically appropriate to the targeted audiences; and newspapers in both English and Spanish.

*In re: Reebok Easytone Litigation,* No. 10-CV-11977 (D. MA. 2011). The Honorable F. Dennis Saylor IV stated in the Final Approval Order:

The Court finds that the dissemination of the Class Notice, the publication of the Summary Settlement Notice, the establishment of a website containing settlement-related materials, the establishment of a toll-free telephone number, and all other



notice methods set forth in the Settlement Agreement and [Ms. Finegan's] Declaration and the notice dissemination methodology implemented pursuant to the Settlement Agreement and this Court's Preliminary Approval Order... constituted the best practicable notice to Class Members under the circumstances of the Actions.

**Bezdek v. Vibram USA and Vibram FiveFingers** LLC, No 12-10513 (D. MA) The Honorable Douglas P. Woodlock stated in the Final Memorandum and Order:

...[O]n independent review I find that the notice program was robust, particularly in its online presence, and implemented as directed in my Order authorizing notice. ...I find that notice was given to the Settlement class members by the best means "practicable under the circumstances." Fed.R.Civ.P. 23(c)(2).

**Gemelas v. The Dannon Company Inc.,** No. 08-cv-00236-DAP (N.D. Ohio). In granting final approval for the settlement, the Honorable Dan A. Polster stated:

In accordance with the Court's Preliminary Approval Order and the Court-approved notice program, [Ms. Finegan] caused the Class Notice to be distributed on a nationwide basis in magazines and newspapers (with circulation numbers exceeding 81 million) specifically chosen to reach Class Members. ... The distribution of Class Notice constituted the best notice practicable under the circumstances, and fully satisfied the requirements of Federal Rule of Civil Procedure 23, the requirements of due process, 28 U.S.C. 1715, and any other applicable law.

**Pashmova v. New Balance Athletic Shoes, Inc.**, 1:11-cv-10001-LTS (D. Mass.). The Honorable Leo T. Sorokin stated in the Final Approval Order:

The Class Notice, the Summary Settlement Notice, the web site, and all other notices in the Settlement Agreement and the Declaration of [Ms Finegan], and the notice methodology implemented pursuant to the Settlement Agreement: (a) constituted the best practicable notice under the circumstances; (b) constituted notice that was reasonably calculated to apprise Class Members of the pendency of the Actions, the terms of the Settlement and their rights under the settlement ... met all applicable requirements of law, including, but not limited to, the Federal Rules of Civil Procedure, 28 U.S.C. § 1715, and the Due Process Clause(s) of the United States Constitution, as well as complied with the Federal Judicial Center's illustrative class action notices.

*Hartless v. Clorox Company*, No. 06-CV-2705 (CAB) (S.D.Cal.). In the Final Order Approving Settlement, the Honorable Cathy N. Bencivengo found:

The Class Notice advised Class members of the terms of the settlement; the Final Approval Hearing and their right to appear at such hearing; their rights to remain in or opt out of the Class and to object to the settlement; the procedures for exercising such rights; and the binding effect of this Judgment, whether favorable or unfavorable, to the Class. The distribution of the notice to the Class constituted the best notice



practicable under the circumstances, and fully satisfied the requirements of Federal Rule of Civil Procedure 23, the requirements of due process, 28 U.S.C. §1715, and any other applicable law.

**McDonough et al v. Toys 'R' Us et al,** No. 09:-cv-06151-AB (E.D. Pa.). In the Final Order and Judgment Approving Settlement, the Honorable Anita Brody stated:

The Court finds that the Notice provided constituted the best notice practicable under the circumstances and constituted valid, due and sufficient notice to all persons entitled thereto.

*In re: Pre-Filled Propane Tank Marketing & Sales Practices Litigation,* No. 4:09-md-02086-GAF (W.D. Mo.) In granting final approval to the settlement, the Honorable Gary A. Fenner stated:

The notice program included individual notice to class members who could be identified by Ferrellgas, publication notices, and notices affixed to Blue Rhino propane tank cylinders sold by Ferrellgas through various retailers. ... The Court finds the notice program fully complied with Federal Rule of Civil Procedure 23 and the requirements of due process and provided to the Class the best notice practicable under the circumstances.

*Stern v. AT&T Mobility Wireless*, No. 09-cv-1112 CAS-AGR (C.D.Cal. 2009). In the Final Approval Order, the Honorable Christina A. Snyder stated:

[T]he Court finds that the Parties have fully and adequately effectuated the Notice Plan, as required by the Preliminary Approval Order, and, in fact, have achieved better results than anticipated or required by the Preliminary Approval Order.

*In re: Processed Egg Prods. Antitrust Litig.*, MDL No. 08-md-02002 (E.D.P.A.). In the Order Granting Final Approval of Settlement, Judge Gene E.K. Pratter stated:

The Notice appropriately detailed the nature of the action, the Class claims, the definition of the Class and Subclasses, the terms of the proposed settlement agreement, and the class members' right to object or request exclusion from the settlement and the timing and manner for doing so.... Accordingly, the Court determines that the notice provided to the putative Class Members constitutes adequate notice in satisfaction of the demands of Rule 23.

*In re Polyurethane Foam Antitrust Litigation*, 10- MD-2196 (N.D. OH). In the Order Granting Final Approval of Voluntary Dismissal and Settlement of Defendant Domfoam and Others, the Honorable Jack Zouhary stated:

The notice program included individual notice to members of the Class who could be identified through reasonable effort, as well as extensive publication of a summary



notice. The Notice constituted the most effective and best notice practicable under the circumstances of the Settlement Agreements, and constituted due and sufficient notice for all other purposes to all persons and entities entitled to receive notice.

**Rojas v Career Education Corporation**, No. 10-cv-05260 (N.D.E.D. IL) In the Final Approval Order dated October 25, 2012, the Honorable Virgina M. Kendall stated:

The Court Approved notice to the Settlement Class as the best notice practicable under the circumstance including individual notice via U.S. Mail and by email to the class members whose addresses were obtained from each Class Member's wireless carrier or from a commercially reasonable reverse cell phone number look-up service, nationwide magazine publication, website publication, targeted on-line advertising, and a press release. Notice has been successfully implemented and satisfies the requirements of the Federal Rule of Civil Procedure 23 and Due Process.

Golloher v Todd Christopher International, Inc. DBA Vogue International (Organix), No. C 1206002 N.D CA. In the Final Order and Judgment Approving Settlement, the Honorable Richard Seeborg stated:

The distribution of the notice to the Class constituted the best notice practicable under the circumstances, and fully satisfied the requirements of Federal Rule of Civil Procedure 23, the requirements of due process, 28 U.S.C. §1715, and any other applicable law.

**Stefanyshyn v. Consolidated Industries**, No. 79 D 01-9712-CT-59 (Tippecanoe County Sup. Ct., Ind.). In the Order Granting Final Approval of Settlement, Judge Randy Williams stated:

The long and short form notices provided a neutral, informative, and clear explanation of the Settlement. ... The proposed notice program was properly designed, recommended, and implemented ... and constitutes the "best practicable" notice of the proposed Settlement. The form and content of the notice program satisfied all applicable legal requirements. ... The comprehensive class notice educated Settlement Class members about the defects in Consolidated furnaces and warned them that the continued use of their furnaces created a risk of fire and/or carbon monoxide. This alone provided substantial value.

McGee v. Continental Tire North America, Inc. et al, No. 06-6234-(GEB) (D.N.J.).

The Class Notice, the Summary Settlement Notice, the web site, the toll-free telephone number, and all other notices in the Agreement, and the notice methodology implemented pursuant to the Agreement: (a) constituted the best practicable notice under the circumstances; (b) constituted notice that was reasonably calculated to apprise Class Members of the pendency of the Action, the terms of the settlement and their rights under the settlement, including, but not limited to, their right to object to



or exclude themselves from the proposed settlement and to appear at the Fairness Hearing; (c) were reasonable and constituted due, adequate and sufficient notice to all persons entitled to receive notification; and (d) met all applicable requirements of law, including, but not limited to, the Federal Rules of Civil Procedure, 20 U.S.C. Sec. 1715, and the Due Process Clause(s) of the United States Constitution, as well as complied with the Federal Judicial Center's illustrative class action notices,

*Varacallo, et al. v. Massachusetts Mutual Life Insurance Company, et al.*, No. 04-2702 (JLL) (D.N.J.). The Court stated that:

[A]II of the notices are written in simple terminology, are readily understandable by Class Members, and comply with the Federal Judicial Center's illustrative class action notices. ... By working with a nationally syndicated media research firm, [Finegan's firm] was able to define a target audience for the MassMutual Class Members, which provided a valid basis for determining the magazine and newspaper preferences of the Class Members. (Preliminary Approval Order at p. 9). . . . The Court agrees with Class Counsel that this was more than adequate. (Id. at § 5.2).

In re: Nortel Network Corp., Sec. Litig., No. 01-CV-1855 (RMB) Master File No. 05 MD 1659 (LAP) (S.D.N.Y.). Ms. Finegan designed and implemented the extensive United States and Canadian notice programs in this case. The Canadian program was published in both French and English, and targeted virtually all investors of stock in Canada. See www.nortelsecuritieslitigation.com. Of the U.S. notice program, the Honorable Loretta A. Preska stated:

The form and method of notifying the U.S. Global Class of the pendency of the action as a class action and of the terms and conditions of the proposed Settlement ... constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled thereto.

Regarding the B.C. Canadian Notice effort: *Jeffrey v. Nortel Networks*, [2007] BCSC 69 at para. 50, the Honourable Mr. Justice Groberman said:

The efforts to give notice to potential class members in this case have been thorough. There has been a broad media campaign to publicize the proposed settlement and the court processes. There has also been a direct mail campaign directed at probable investors. I am advised that over 1.2 million claim packages were mailed to persons around the world. In addition, packages have been available through the worldwide web site nortelsecuritieslitigation.com on the Internet. Toll-free telephone lines have been set up, and it appears that class counsel and the Claims Administrator have received innumerable calls from potential class members. In short, all reasonable efforts have been made to ensure that potential members of the class have had notice



of the proposal and a reasonable opportunity was provided for class members to register their objections, or seek exclusion from the settlement.

*Mayo v. Walmart Stores and Sam's Club*, No. 5:06 CV-93-R (W.D.Ky.). In the Order Granting Final Approval of Settlement, Judge Thomas B. Russell stated:

According to defendants' database, the Notice was estimated to have reached over 90% of the Settlement Class Members through direct mail. The Settlement Administrator ... has classified the parties' database as 'one of the most reliable and comprehensive databases [she] has worked with for the purposes of legal notice.'... The Court thus reaffirms its findings and conclusions in the Preliminary Approval Order that the form of the Notice and manner of giving notice satisfy the requirements of Fed. R. Civ. P. 23 and affords due process to the Settlement Class Members.

**Fishbein v. All Market Inc.**, (d/b/a **Vita Coco**) No. 11-cv-05580 (S.D.N.Y.). In granting final approval of the settlement, the Honorable J. Paul Oetken stated:

"The Court finds that the dissemination of Class Notice pursuant to the Notice Program...constituted the best practicable notice to Settlement Class Members under the circumstances of this Litigation ... and was reasonable and constituted due, adequate and sufficient notice to all persons entitled to such notice, and fully satisfied the requirements of the Federal Rules of Civil Procedure, including Rules 23(c)(2) and (e), the United States Constitution (including the Due Process Clause), the Rules of this Court, and any other applicable laws."

*Lucas, et al. v. Kmart Corp.*, No. 99-cv-01923 (D.Colo.), wherein the Court recognized Jeanne Finegan as an expert in the design of notice programs, and stated:

The Court finds that the efforts of the parties and the proposed Claims Administrator in this respect go above and beyond the "reasonable efforts" required for identifying individual class members under F.R.C.P. 23(c)(2)(B).

In re: Johns-Manville Corp. (Statutory Direct Action Settlement, Common Law Direct Action and Hawaii Settlement), No 82-11656, 57, 660, 661, 665-73, 75 and 76 (BRL) (Bankr. S.D.N.Y.). The nearly half-billion dollar settlement incorporated three separate notification programs, which targeted all persons who had asbestos claims whether asserted or unasserted, against the Travelers Indemnity Company. In the Findings of Fact and Conclusions of a Clarifying Order Approving the Settlements, slip op. at 47-48 (Aug. 17, 2004), the Honorable Burton R. Lifland, Chief Justice, stated:

As demonstrated by Findings of Fact (citation omitted), the Statutory Direct Action Settlement notice program was reasonably calculated under all circumstances to apprise the affected individuals of the proceedings and actions taken involving their interests, Mullane v. Cent. Hanover Bank & Trust Co., 339 U.S. 306, 314 (1950), such



program did apprise the overwhelming majority of potentially affected claimants and far exceeded the minimum notice required. . . The results simply speak for themselves.

**Pigford v. Glickman and U.S. Department of Agriculture,** No. 97-1978. 98-1693 (PLF) (D.D.C.). This matter was the largest civil rights case to settle in the United States in over 40 years. The highly publicized, nationwide paid media program was designed to alert all present and past African-American farmers of the opportunity to recover monetary damages against the U.S. Department of Agriculture for alleged loan discrimination. In his Opinion, the Honorable Paul L. Friedman commended the parties with respect to the notice program, stating;

The parties also exerted extraordinary efforts to reach class members through a massive advertising campaign in general and African American targeted publications and television stations. . . . The Court concludes that class members have received more than adequate notice and have had sufficient opportunity to be heard on the fairness of the proposed Consent Decree.

*In re: Louisiana-Pacific Inner-Seal Siding Litig.*, Nos. 879-JE, and 1453-JE (D.Or.). Under the terms of the Settlement, three separate notice programs were to be implemented at three-year intervals over a period of six years. In the first notice campaign, Ms. Finegan implemented the print advertising and Internet components of the Notice program. In approving the legal notice communication plan, the Honorable Robert E. Jones stated:

The notice given to the members of the Class fully and accurately informed the Class members of all material elements of the settlement...[through] a broad and extensive multi-media notice campaign.

Additionally, with regard to the third-year notice program for Louisiana-Pacific, the Honorable Richard Unis, Special Master, commented that the notice was:

...well formulated to conform to the definition set by the court as adequate and reasonable notice. Indeed, I believe the record should also reflect the Court's appreciation to Ms. Finegan for all the work she's done, ensuring that noticing was done correctly and professionally, while paying careful attention to overall costs. Her understanding of various notice requirements under Fed. R. Civ. P. 23, helped to insure that the notice given in this case was consistent with the highest standards of compliance with Rule 23(d)(2).

*In re: Expedia Hotel Taxes and Fees Litigation*, No. 05-2-02060-1 (SEA) (Sup. Ct. of Wash. in and for King County). In the Order Granting Final Approval of Class Action Settlement, Judge Monica Benton stated:

The Notice of the Settlement given to the Class ... was the best notice practicable under the circumstances. All of these forms of Notice directed Class Members to a

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Settlement Website providing key Settlement documents including instructions on how Class Members could exclude themselves from the Class, and how they could object to or comment upon the Settlement. The Notice provided due and adequate notice of these proceeding and of the matters set forth in the Agreement to all persons entitled to such notice, and said notice fully satisfied the requirements of CR 23 and due process.

**Thomas A. Foster and Linda E. Foster v. ABTco Siding Litigation**, No. 95-151-M (Cir. Ct., Choctaw County, Ala.). This litigation focused on past and present owners of structures sided with Abitibi-Price siding. The notice program that Ms. Finegan designed and implemented was national in scope and received the following praise from the Honorable J. Lee McPhearson:

The Court finds that the Notice Program conducted by the Parties provided individual notice to all known Class Members and all Class Members who could be identified through reasonable efforts and constitutes the best notice practicable under the circumstances of this Action. This finding is based on the overwhelming evidence of the adequacy of the notice program. ... The media campaign involved broad national notice through television and print media, regional and local newspapers, and the Internet (see id. ¶¶9-11) The result: over 90 percent of Abitibi and ABTco owners are estimated to have been reached by the direct media and direct mail campaign.

*Wilson v. Massachusetts Mut. Life Ins. Co.*, No. D-101-CV 98-02814 (First Judicial Dist. Ct., County of Santa Fe, N.M.). This was a nationwide notification program that included all persons in the United States who owned, or had owned, a life or disability insurance policy with Massachusetts Mutual Life Insurance Company and had paid additional charges when paying their premium on an installment basis. The class was estimated to exceed 1.6 million individuals. www.insuranceclassclaims.com. In granting preliminary approval to the settlement, the Honorable Art Encinias found:

[T]he Notice Plan [is] the best practicable notice that is reasonably calculated, under the circumstances of the action. ...[and] meets or exceeds all applicable requirements of the law, including Rule 1-023(C)(2) and (3) and 1-023(E), NMRA 2001, and the requirements of federal and/or state constitutional due process and any other applicable law.

**Sparks v. AT&T Corp.**, No. 96-LM-983 (Third Judicial Cir., Madison County, Ill.). The litigation concerned all persons in the United States who leased certain AT&T telephones during the 1980's. Ms. Finegan designed and implemented a nationwide media program designed to target all persons who may have leased telephones during this time period, a class that included a large percentage of the entire population of the United States. In granting final approval to the settlement, the Court found:

The Court further finds that the notice of the proposed settlement was sufficient and furnished Class Members with the information they needed to evaluate whether to



participate in or opt out of the proposed settlement. The Court therefore concludes that the notice of the proposed settlement met all requirements required by law, including all Constitutional requirements.

In re: Georgia-Pacific Toxic Explosion Litig., No. 98 CVC05-3535 (Ct. of Common Pleas, Franklin County, Ohio). Ms. Finegan designed and implemented a regional notice program that included network affiliate television, radio and newspaper. The notice was designed to alert adults living near a Georgia-Pacific plant that they had been exposed to an air-born toxic plume and their rights under the terms of the class action settlement. In the Order and Judgment finally approving the settlement, the Honorable Jennifer L. Bunner stated:

[N]otice of the settlement to the Class was the best notice practicable under the circumstances, including individual notice to all members who can be identified through reasonable effort. The Court finds that such effort exceeded even reasonable effort and that the Notice complies with the requirements of Civ. R. 23(C).

*In re: American Cyanamid*, No. CV-97-0581-BH-M (S.D.Al.). The media program targeted Farmers who had purchased crop protection chemicals manufactured by American Cyanamid. In the Final Order and Judgment, the Honorable Charles R. Butler Jr. wrote:

The Court finds that the form and method of notice used to notify the Temporary Settlement Class of the Settlement satisfied the requirements of Fed. R. Civ. P. 23 and due process, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all potential members of the Temporary Class Settlement.

In re: First Alert Smoke Alarm Litig., No. CV-98-C-1546-W (UWC) (N.D.Al.). Ms. Finegan designed and implemented a nationwide legal notice and public information program. The public information program ran over a two-year period to inform those with smoke alarms of the performance characteristics between photoelectric and ionization detection. The media program included network and cable television, magazine and specialty trade publications. In the Findings and Order Preliminarily Certifying the Class for Settlement Purposes, Preliminarily Approving Class Settlement, Appointing Class Counsel, Directing Issuance of Notice to the Class, and Scheduling a Fairness Hearing, the Honorable C.W. Clemon wrote that the notice plan:

...constitutes due, adequate and sufficient notice to all Class Members; and (v) meets or exceeds all applicable requirements of the Federal Rules of Civil Procedure, the United States Constitution (including the Due Process Clause), the Alabama State Constitution, the Rules of the Court, and any other applicable law.

*In re: James Hardie Roofing Litig.*, No. 00-2-17945-65SEA (Sup. Ct. of Wash., King County). The nationwide legal notice program included advertising on television, in print and on the Internet. The program was designed to reach all persons who own any structure with JHBP roofing products. In the Final Order and Judgment, the Honorable Steven Scott stated:



The notice program required by the Preliminary Order has been fully carried out... [and was] extensive. The notice provided fully and accurately informed the Class Members of all material elements of the proposed Settlement and their opportunity to participate in or be excluded from it; was the best notice practicable under the circumstances; was valid, due and sufficient notice to all Class Members; and complied fully with Civ. R. 23, the United States Constitution, due process, and other applicable law.

Barden v. Hurd Millwork Co. Inc., et al, No. 2:6-cv-00046 (LA) (E.D.Wis.) ("The Court approves, as to form and content, the notice plan and finds that such notice is the best practicable under the circumstances under Federal Rule of Civil Procedure 23(c)(2)(B) and constitutes notice in a reasonable manner under Rule 23(e)(1).")

Altieri v. Reebok, No. 4:10-cv-11977 (FDS) (D.C.Mass.) ("The Court finds that the notices ... constitute the best practicable notice... The Court further finds that all of the notices are written in simple terminology, are readily understandable by Class Members, and comply with the Federal Judicial Center's illustrative class action notices.")

Marenco v. Visa Inc., No. CV 10-08022 (DMG) (C.D.Cal.) ("[T]he Court finds that the notice plan...meets the requirements of due process, California law, and other applicable precedent. The Court finds that the proposed notice program is designed to provide the Class with the best notice practicable, under the circumstances of this action, of the pendency of this litigation and of the proposed Settlement's terms, conditions, and procedures, and shall constitute due and sufficient notice to all persons entitled thereto under California law, the United States Constitution, and any other applicable law.")

Palmer v. Sprint Solutions, Inc., No. 09-cv-01211 (JLR) (W.D.Wa.) ("The means of notice were reasonable and constitute due, adequate, and sufficient notice to all persons entitled to be provide3d with notice.")

In re: Tyson Foods, Inc., Chicken Raised Without Antibiotics Consumer Litigation, No. 1:08-md-01982 RDB (D. Md. N. Div.) ("The notice, in form, method, and content, fully complied with the requirements of Rule 23 and due process, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons entitled to notice of the settlement.")

Sager v. Inamed Corp. and McGhan Medical Breast Implant Litigation, No. 01043771 (Sup. Ct. Cal., County of Santa Barbara) ("Notice provided was the best practicable under the circumstances.").

Deke, et al. v. Cardservice Internat'l, Case No. BC 271679, slip op. at 3 (Sup. Ct. Cal., County of Los Angeles) ("The Class Notice satisfied the requirements of California Rules of Court 1856



and 1859 and due process and constituted the best notice practicable under the circumstances.").

Levine, et al. v. Dr. Philip C. McGraw, et al., Case No. BC 312830 (Los Angeles County Super. Ct., Cal.) ("[T]he plan for notice to the Settlement Class ... constitutes the best notice practicable under the circumstances and constituted due and sufficient notice to the members of the Settlement Class ... and satisfies the requirements of California law and federal due process of law.").

In re: Canadian Air Cargo Shipping Class Actions, Court File No. 50389CP, Ontario Superior Court of Justice, Supreme Court of British Columbia, Quebec Superior Court ("I am satisfied the proposed form of notice meets the requirements of s. 17(6) of the CPA and the proposed method of notice is appropriate.").

*Fischer et al v. IG Investment Management, Ltd. et al*, Court File No. 06-CV-307599CP, Ontario Superior Court of Justice.

In re: Vivendi Universal, S.A. Securities Litigation, No. 02-cv-5571 (RJH)(HBP) (S.D.N.Y.).

In re: Air Cargo Shipping Services Antitrust Litigation, No. 06-MD-1775 (JG) (VV) (E.D.N.Y.).

Berger, et al., v. Property ID Corporation, et al., No. CV 05-5373-GHK (CWx) (C.D.Cal.).

Lozano v. AT&T Mobility Wireless, No. 02-cv-0090 CAS (AJWx) (C.D.Cal.).

Howard A. Engle, M.D., et al., v. R.J. Reynolds Tobacco Co., Philip Morris, Inc., Brown & Williamson Tobacco Corp., No. 94-08273 CA (22) (11<sup>th</sup> Judicial Dist. Ct. of Miami-Dade County, Fla.).

*In re: Royal Dutch/Shell Transport Securities Litigation,* No. 04 Civ. 374 (JAP) (Consolidated Cases) (D. N.J.).

*In re: Epson Cartridge Cases, Judicial Council Coordination Proceeding*, No. 4347 (Sup. Ct. of Cal., County of Los Angeles).

**UAW v. General Motors Corporation**, No: 05-73991 (E.D.MI).

Wicon, Inc. v. Cardservice Intern'l, Inc., BC 320215 (Sup. Ct. of Cal., County of Los Angeles).

*In re: SmithKline Beecham Clinical Billing Litig.*, No. CV. No. 97-L-1230 (Third Judicial Cir., Madison County, III.). Ms. Finegan designed and developed a national media and Internet site notification program in connection with the settlement of a nationwide class action concerning billings for clinical laboratory testing services.



*MacGregor v. Schering-Plough Corp.*, No. EC248041 (Sup. Ct. Cal., County of Los Angeles). This nationwide notification program was designed to reach all persons who had purchased or used an aerosol inhaler manufactured by Schering-Plough. Because no mailing list was available, notice was accomplished entirely through the media program.

*In re: Swiss Banks Holocaust Victim Asset Litig.*, No. CV-96-4849 (E.D.N.Y.). Ms. Finegan managed the design and implementation of the Internet site on this historic case. The site was developed in 21 native languages. It is a highly secure data gathering tool and information hub, central to the global outreach program of Holocaust survivors. www.swissbankclaims.com.

*In re: Exxon Valdez Oil Spill Litig.*, No. A89-095-CV (HRH) (Consolidated) (D. Alaska). Ms. Finegan designed and implemented two media campaigns to notify native Alaskan residents, trade workers, fisherman, and others impacted by the oil spill of the litigation and their rights under the settlement terms.

*In re: Johns-Manville Phenolic Foam Litig.*, No. CV 96-10069 (D. Mass). The nationwide multimedia legal notice program was designed to reach all Persons who owned any structure, including an industrial building, commercial building, school, condominium, apartment house, home, garage or other type of structure located in the United States or its territories, in which Johns-Manville PFRI was installed, in whole or in part, on top of a metal roof deck.

**Bristow v Fleetwood Enters Litig.**, No Civ 00-0082-S-EJL (D. Id). Ms. Finegan designed and implemented a legal notice campaign targeting present and former employees of Fleetwood Enterprises, Inc., or its subsidiaries who worked as hourly production workers at Fleetwood's housing, travel trailer, or motor home manufacturing plants. The comprehensive notice campaign included print, radio and television advertising.

In re: New Orleans Tank Car Leakage Fire Litig., No 87-16374 (Civil Dist. Ct., Parish of Orleans, LA) (2000). This case resulted in one of the largest settlements in U.S. history. This campaign consisted of a media relations and paid advertising program to notify individuals of their rights under the terms of the settlement.

**Garria Spencer v. Shell Oil Co.**, No. CV 94-074(Dist. Ct., Harris County, Tex.). The nationwide notification program was designed to reach individuals who owned real property or structures in the United States, which contained polybutylene plumbing with acetyl insert or metal insert fittings.

*In re:* Hurd Millwork Heat Mirror™ Litig., No. CV-772488 (Sup. Ct. of Cal., County of Santa Clara). This nationwide multi-media notice program was designed to reach class members with failed heat mirror seals on windows and doors, and alert them as to the actions that they needed to take to receive enhanced warranties or window and door replacement.

Laborers Dist. Counsel of Alabama Health and Welfare Fund v. Clinical Lab. Servs., Inc, No. CV-97-C-629-W (N.D. Ala.). Ms. Finegan designed and developed a national media and Internet



site notification program in connection with the settlement of a nationwide class action concerning alleged billing discrepancies for clinical laboratory testing services.

*In re: StarLink Corn Prods. Liab. Litig.*, No. 01-C-1181 (N.D. III).. Ms. Finegan designed and implemented a nationwide notification program designed to alert potential class members of the terms of the settlement.

*In re: MCI Non-Subscriber Rate Payers Litig.*, MDL Docket No. 1275, 3:99-cv-01275 (S.D.III.). The advertising and media notice program, found to be "more than adequate" by the Court, was designed with the understanding that the litigation affected all persons or entities who were customers of record for telephone lines presubscribed to MCI/World Com, and were charged the higher non-subscriber rates and surcharges for direct-dialed long distance calls placed on those lines. www.rateclaims.com.

*In re: Albertson's Back Pay Litig.*, No. 97-0159-S-BLW (D.Id.). Ms. Finegan designed and developed a secure Internet site, where claimants could seek case information confidentially.

*In re:* Georgia Pacific Hardboard Siding Recovering Program, No. CV-95-3330-RG (Cir. Ct., Mobile County, Ala.). Ms. Finegan designed and implemented a multi-media legal notice program, which was designed to reach class members with failed G-P siding and alert them of the pending matter. Notice was provided through advertisements, which aired on national cable networks, magazines of nationwide distribution, local newspaper, press releases and trade magazines.

*In re: Diet Drugs* (Phentermine, Fenfluramine, Dexfenfluramine) Prods. Liab. Litig., Nos. 1203, 99-20593. Ms. Finegan worked as a consultant to the National Diet Drug Settlement Committee on notification issues. The resulting notice program was described and complimented at length in the Court's Memorandum and Pretrial Order 1415, approving the settlement,

*In re: Diet Drugs* (Phentermine, Fenfluramine, Dexfenfluramine) Prods. Liab. Litig., 2000 WL 1222042, Nos. 1203, 99-20593 (E.D.Pa. Aug. 28, 2002).

Ms. Finegan designed the Notice programs for multiple state antitrust cases filed against the Microsoft Corporation. In those cases, it was generally alleged that Microsoft unlawfully used anticompetitive means to maintain a monopoly in markets for certain software, and that as a result, it overcharged consumers who licensed its MS-DOS, Windows, Word, Excel and Office software. The multiple legal notice programs designed by Jeanne Finegan and listed below targeted both individual users and business users of this software. The scientifically designed notice programs took into consideration both media usage habits and demographic characteristics of the targeted class members.

*In re: Florida Microsoft Antitrust Litig. Settlement*, No. 99-27340 CA 11 (11<sup>th</sup> Judicial Dist. Ct. of Miami-Dade County, Fla.).



*In re: Montana Microsoft Antitrust Litig. Settlement*, No. DCV 2000 219 (First Judicial Dist. Ct., Lewis & Clark Co., Mt.).

*In re: South Dakota Microsoft Antitrust Litig. Settlement*, No. 00-235(Sixth Judicial Cir., County of Hughes, S.D.).

*In re: Kansas Microsoft Antitrust Litig. Settlement*, No. 99C17089 Division No. 15 Consolidated Cases (Dist. Ct., Johnson County, Kan.) ("The Class Notice provided was the best notice practicable under the circumstances and fully complied in all respects with the requirements of due process and of the Kansas State. Annot. §60-22.3.").

*In re: North Carolina Microsoft Antitrust Litig. Settlement,* No. 00-CvS-4073 (Wake) 00-CvS-1246 (Lincoln) (General Court of Justice Sup. Ct., Wake and Lincoln Counties, N.C.).

*In re: ABS II Pipes Litig.*, No. 3126 (Sup. Ct. of Cal., Contra Costa County). The Court approved regional notification program designed to alert those individuals who owned structures with the pipe that they were eligible to recover the cost of replacing the pipe.

In re: Avenue A Inc. Internet Privacy Litig., No: C00-1964C (W.D. Wash.).

In re: Lorazepam and Clorazepate Antitrust Litig., No. 1290 (TFH) (D.C.C.).

In re: Providian Fin. Corp. ERISA Litig., No C-01-5027 (N.D. Cal.).

In re: H & R Block., et al Tax Refund Litig., No. 97195023/CC4111 (MD Cir. Ct., Baltimore City).

*In re: American Premier Underwriters, Inc, U.S. Railroad Vest Corp.*, No. 06C01-9912 (Cir. Ct., Boone County, Ind.).

In re: Sprint Corp. Optical Fiber Litia., No: 9907 CV 284 (Dist. Ct., Leavenworth County, Kan).

In re: Shelter Mutual Ins. Co. Litig., No. CJ-2002-263 (Dist.Ct., Canadian County. Ok).

*In re: Conseco, Inc. Sec. Litig.*, No: IP-00-0585-C Y/S CA (S.D. Ind.).

In re: Nat'l Treasury Employees Union, et al., 54 Fed. Cl. 791 (2002).

*In re: City of Miami Parking Litig.*, Nos. 99-21456 CA-10, 99-23765 — CA-10 (11<sup>th</sup> Judicial Dist. Ct. of Miami-Dade County, Fla.).

In re: Prime Co. Incorporated D/B/A/ Prime Co. Personal Comm., No. L 1:01CV658 (E.D. Tx.).

**Alsea Veneer v. State of Oregon A.A.**, No. 88C-11289-88C-11300.



#### INTERNATIONAL EXPERIENCE

**Bell v. Canadian Imperial Bank of Commerce**, et al, Court File No.: CV-08-359335 (Ontario Superior Court of Justice); (2016).

*In re: Canadian Air Cargo Shipping Class Actions* (Ontario Superior Court of Justice, Court File No. 50389CP, Supreme Court of British Columbia.

In re: Canadian Air Cargo Shipping Class Actions Québec Superior Court).

**Fischer v. IG Investment Management LTD**., No. 06-CV-307599CP (Ontario Superior Court of Justice).

In Re Nortel I & II Securities Litigation, Civil Action No. 01-CV-1855 (RMB), Master File No. 05 MD 1659 (LAP) (S.D.N.Y. 2006).

**Frohlinger v. Nortel Networks Corporation** et al., Court File No.: 02-CL-4605 (Ontario Superior Court of Justice).

Association de Protection des Épargnants et Investissuers du Québec v. Corporation Nortel Networks, No.: 500-06-0002316-017 (Superior Court of Québec).

**Jeffery v. Nortel Networks Corporation** et al., Court File No.: S015159 (Supreme Court of British Columbia).

Gallardi v. Nortel Networks Corporation, No. 05-CV-285606CP (Ontario Superior Court).

Skarstedt v. Corporation Nortel Networks, No. 500-06-000277-059 (Superior Court of Québec).

#### SEC ENFORCEMENT NOTICE PROGRAM EXPERIENCE

**SEC v. Vivendi Universal, S.A., et al.,** Case No. 02 Civ. 5571 (RJH) (HBP) (S.D.N.Y.). The Notice program included publication in 11 different countries and eight different languages.

**SEC v. Royal Dutch Petroleum Company**, No.04-3359 (S.D. Tex.)

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#### FEDERAL TRADE COMMISSION NOTICE PROGRAM EXPERIENCE

FTC v. TracFone Wireless, Inc., Case No. 15-cv-00392-EMC.

FTC v. Skechers U.S.A., Inc., No. 1:12-cv-01214-JG (N.D. Ohio).

FTC v. Reebok International Ltd., No. 11-cv-02046 (N.D. Ohio)

FTC v. Chanery and RTC Research and Development LLC [Nutraquest], No :05-cv-03460 (D.N.J.)

#### **BANKRUPTCY EXPERIENCE**

Ms. Finegan has designed and implemented hundreds of domestic and international bankruptcy notice programs. A sample case list includes the following:

In re AMR Corporation [American Airlines], et al., No. 11-15463 (SHL) (Bankr. S.D.N.Y.) ("due and proper notice [was] provided, and ... no other or further notice need be provided.")

In re Jackson Hewitt Tax Service Inc., et al., No 11-11587 (Bankr. D.Del.) (2011). The debtors sought to provide notice of their filing as well as the hearing to approve their disclosure statement and confirm their plan to a large group of current and former customers, many of whom current and viable addresses promised to be a difficult (if not impossible) and costly undertaking. The court approved a publication notice program designed and implemented by Finegan and the administrator, that included more than 350 local newspaper and television websites, two national online networks (24/7 Real Media, Inc. and Microsoft Media Network), a website notice linked to a press release and notice on eight major websites, including CNN and Yahoo. These online efforts supplemented the print publication and direct-mail notice provided to known claimants and their attorneys, as well as to the state attorneys general of all 50 states. The Jackson Hewitt notice program constituted one of the first large chapter 11 cases to incorporate online advertising.

In re: Nutraquest Inc., No. 03-44147 (Bankr. D.N.J.)

*In re: General Motors Corp. et al*, No. 09-50026 (Bankr. S.D.N.Y.). This case is the 4<sup>th</sup> largest bankruptcy in U.S. history. Ms. Finegan and her team worked with General Motors restructuring attorneys to design and implement the legal notice program.

In re: ACandS, Inc., No. 0212687 (Bankr. D.Del.) (2007) ("Adequate notice of the Motion and of the hearing on the Motion was given.").

*In re: United Airlines*, No. 02-B-48191 (Bankr. N.D III.). Ms. Finegan worked with United and its restructuring attorneys to design and implement global legal notice programs. The notice was published in 11 countries and translated into 6 languages. Ms. Finegan worked closely with



legal counsel and UAL's advertising team to select the appropriate media and to negotiate the most favorable advertising rates. www.pd-ual.com.

*In re: Enron*, No. 01-16034 (Bankr. S.D.N.Y.). Ms. Finegan worked with Enron and its restructuring attorneys to publish various legal notices.

*In re: Dow Corning,* No. 95-20512 (Bankr. E.D. Mich.). Ms. Finegan originally designed the information website. This Internet site is a major information hub that has various forms in 15 languages.

*In re: Harnischfeger Inds.*, No. 99-2171 (RJW) Jointly Administered (Bankr. D. Del.). Ms. Finegan designed and implemented 6 domestic and international notice programs for this case. The notice was translated into 14 different languages and published in 16 countries.

*In re: Keene Corp.*, No. 93B 46090 (SMB), (Bankr. E.D. MO.). Ms. Finegan designed and implemented multiple domestic bankruptcy notice programs including notice on the plan of reorganization directed to all creditors and all Class 4 asbestos-related claimants and counsel.

*In re: Lamonts*, No. 00-00045 (Bankr. W.D. Wash.). Ms. Finegan designed an implemented multiple bankruptcy notice programs.

*In re: Monet Group Holdings*, Nos. 00-1936 (MFW) (Bankr. D. Del.). Ms. Finegan designed and implemented a bar date notice.

*In re: Laclede Steel Co.*, No. 98-53121-399 (Bankr. E.D. MO.). Ms. Finegan designed and implemented multiple bankruptcy notice programs.

*In re: Columbia Gas Transmission Corp.*, No. 91-804 (Bankr. S.D.N.Y.). Ms. Finegan developed multiple nationwide legal notice notification programs for this case.

*In re: U.S.H. Corp. of New York, et al.* (Bankr. S.D.N.Y). Ms. Finegan designed and implemented a bar date advertising notification campaign.

*In re: Best Prods. Co., Inc.,* No. 96-35267-T, (Bankr. E.D. Va.). Ms. Finegan implemented a national legal notice program that included multiple advertising campaigns for notice of sale, bar date, disclosure and plan confirmation.

*In re: Lodgian, Inc., et al.*, No. 16345 (BRL) Factory Card Outlet – 99-685 (JCA), 99-686 (JCA) (Bankr. S.D.N.Y).

*In re: Internat'l Total Servs, Inc., et al.*, Nos. 01-21812, 01-21818, 01-21820, 01-21882, 01-21824, 01-21826, 01-21827 (CD) Under Case No: 01-21812 (Bankr. E.D.N.Y).

In re: Decora Inds., Inc. and Decora, Incorp., Nos. 00-4459 and 00-4460 (JJF) (Bankr. D. Del.).



In re: Genesis Health Ventures, Inc., et al, No. 002692 (PJW) (Bankr. D. Del.).

In re: Tel. Warehouse, Inc., et al, No. 00-2105 through 00-2110 (MFW) (Bankr. D. Del.).

In re: United Cos. Fin. Corp., et al, No. 99-450 (MFW) through 99-461 (MFW) (Bankr. D. Del.).

*In re: Caldor, Inc. New York, The Caldor Corp., Caldor, Inc. CT, et al.*, No. 95-B44080 (JLG) (Bankr. S.D.N.Y).

In re: Physicians Health Corp., et al., No. 00-4482 (MFW) (Bankr. D. Del.).

In re: GC Cos., et al., Nos. 00-3897 through 00-3927 (MFW) (Bankr. D. Del.).

In re: Heilig-Meyers Co., et al., Nos. 00-34533 through 00-34538 (Bankr. E.D. Va.).

#### PRODUCT RECALL AND CRISIS COMMUNICATION EXPERIENCE

**Reser's Fine Foods.** Reser's is a nationally distributed brand and manufacturer of food products through giants such as Albertsons, Costco, Food Lion, WinnDixie, Ingles, Safeway and Walmart. Ms. Finegan designed an enterprise-wide crisis communication plan that included communications objectives, crisis team roles and responsibilities, crisis response procedures, regulatory protocols, definitions of incidents that require various levels of notice, target audiences, and threat assessment protocols. Ms. Finegan worked with the company through two nationwide, high profile recalls, conducting extensive media relations efforts.

Gulf Coast Claims Facility Notice Campaign. Finegan coordinated a massive outreach effort throughout the Gulf Coast region to notify those who have claims as a result of damages caused by the Deep Water Horizon Oil spill. The notice campaign included extensive advertising in newspapers throughout the region, Internet notice through local newspaper, television and radio websites and media relations. The Gulf Coast Claims Facility (GCCF) was an independent claims facility, funded by BP, for the resolution of claims by individuals and businesses for damages incurred as a result of the oil discharges due to the Deepwater Horizon incident on April 20, 2010.

City of New Orleans Tax Revisions, Post-Hurricane Katrina. In 2007, the City of New Orleans revised property tax assessments for property owners. As part of this process, it received numerous appeals to the assessments. An administration firm served as liaison between the city and property owners, coordinating the hearing schedule and providing important information to property owners on the status of their appeal. Central to this effort was the comprehensive outreach program designed by Ms. Finegan, which included a website and a heavy schedule of television, radio and newspaper advertising, along with the coordination of key news interviews about the project picked up by local media.



#### **ARTICLES**

Author, "Creating a Class Notice Program that Satisfies Due Process" Law360, New York, (February 13, 2018 12:58 PM ET).

Author, "3 Considerations for Class Action Notice Brand Safety" Law360, New York, (October 2, 2017 12:24 PM ET).

Author, "What Would Class Action Reform Mean for Notice?" Law360, New York, (April 13, 2017 11:50 AM ET).

Author, "Bots Can Silently Steal your Due Process Notice." Wisconsin Law Journal, April 2017.

Author, "Don't Turn a Blind Eye to Bots. Ad Fraud and Bots are a Reality of the Digital Environment." LinkedIn article March 6, 2107.

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Quoted Article, "Keep Up with Class Action," Kentucky Courier Journal, March 13, 2000.

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#### SPEAKER/EXPERT PANELIST/PRESENTER

American Bar Assn.	Faculty Panelist, 4" Annual Western Regional CLE Class Actions,
	"Big Brother, Information Privacy, and Class Actions: How Big Data
	and Social Media are Changing the Class Action Landscape" San

Francisco, CA June, 2017.

Miami Law Class Action Faculty Panelist, "Settlement and Resolution of Class Actions,"

& Complex Litigation Forum Miami, FL December 2, 2016.

The Knowledge Group Faculty Panelist, "Class Action Settlements: Hot Topics 2016 and

Beyond," Live Webcast, www.theknowledgegroup.org, October

2016.

ABA National Symposium Faculty Panelist, "Ethical Considerations in Settling Class Actions,"

New Orleans, LA, March 2016.

S.F. Banking Attorney Assn. Speaker, "How a Class Action Notice can Make or Break your

Client's Settlement," San Francisco, CA, May 2015.

Perrin Class Action Conf. Faculty Panelist, "Being Media Relevant, What It Means and Why

It Matters – The Social Media Evolution: Trends, Challenges and

Opportunities," Chicago, IL May 2015.

Bridgeport Continuing Ed. Speaker, Webinar "Media Relevant in the Class Notice Context."

July, 2014.

Bridgeport Continuing Ed. Faculty Panelist, "Media Relevant in the Class Notice Context."

Los Angeles, California, April 2014.



CASD 5<sup>th</sup> Annual Speaker, "The Impact of Social Media on Class Action Notice."

Consumer Attorneys of San Diego Class Action Symposium, San

Diego, California, September 2012.

Law Seminars International Speaker, "Class Action Notice: Rules and Statutes Governing FRCP

(b)(3) Best Practicable... What constitutes a best practicable notice? What practitioners and courts should expect in the new era of online and social media." Chicago, IL, October 2011.

\*Voted by attendees as one of the best presentations given.

CASD 4<sup>th</sup> Annual Faculty Panelist, "Reasonable Notice - Insight for practitioners on

the FJC's Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide. Consumer Attorneys of San Diego Class

Action Symposium, San Diego, California, October 2011.

CLE International Faculty Panelist, Building a Workable Settlement Structure, CLE

International, San Francisco, California May, 2011.

CASD Faculty Panelist, "21st Century Class Notice and Outreach." 3nd

Annual Class Action Symposium CASD Symposium, San Diego,

California, October 2010.

CASD Faculty Panelist, "The Future of Notice." 2<sup>nd</sup> Annual Class Action

Symposium CASD Symposium, San Diego California, October 2009.

American Bar Association Speaker, 2008 Annual Meeting, "Practical Advice for Class Action

Settlements: The Future of Notice In the United States and

Internationally – Meeting the Best Practicable Standard."

Section of Business Law Business and Corporate Litigation Committee – Class and Derivative Actions Subcommittee, New

York, NY, August 2008.

Women Lawyers Assn. Faculty Panelist, Women Lawyers Association of Los Angeles

"The Anatomy of a Class Action." Los Angeles, CA, February, 2008.

Warranty Chain Mgmt. Faculty Panelist, Presentation Product Recall Simulation. Tampa,

Florida, March 2007.

Practicing Law Institute. Faculty Panelist, CLE Presentation, 11<sup>th</sup> Annual Consumer

Financial Services Litigation. Presentation: Class Action Settlement Structures – Evolving Notice Standards in the Internet Age. New York/Boston (simulcast), NY March 2006; Chicago, IL April 2006

and San Francisco, CA, May 2006.



**U.S. Consumer Product** Safety Commission

Ms. Finegan participated as an invited expert panelist to the CPSC to discuss ways in which the CPSC could enhance and measure the recall process. As a panelist, Ms Finegan discussed how the CPSC could better motivate consumers to take action on recalls and how companies could scientifically measure and defend their outreach efforts. Bethesda, MD, September 2003.

Weil, Gotshal & Manges

Presenter, CLE presentation, "A Scientific Approach to Legal Notice

Communication." New York, June 2003.

Sidley & Austin

Presenter, CLE presentation, "A Scientific Approach to Legal

Notice Communication." Los Angeles, May 2003.

Kirkland & Ellis

Speaker to restructuring group addressing "The Best Practicable Methods to Give Notice in a Tort Bankruptcy." Chicago, April

2002.

Georgetown University Law Faculty, CLE White Paper: "What are the best practicable methods

to Center Mass Tort Litigation give notice? Dispelling the communications myth - A notice Institute disseminated is a notice communicated," Mass Tort Litigation Institute. Washington

D.C., November, 2001.

American Bar Association

Presenter, "How to Bullet-Proof Notice Programs and What Communication Barriers Present Due Process Concerns in Legal Notice," ABA Litigation Section Committee on Class Actions &

Derivative Suits. Chicago, IL, August 6, 2001.

McCutchin, Doyle, Brown

Speaker to litigation group in San Francisco and simulcast to four other McCutchin locations, addressing the definition of effective notice and barriers to communication that affect due process in

legal notice. San Francisco, CA, June 2001.

Marylhurst University

Guest lecturer on public relations research methods. Portland,

OR, February 2001.

University of Oregon

Guest speaker to MBA candidates on quantitative and qualitative research for marketing and communications programs. Portland,

OR, May 2001.

Judicial Arbitration & Mediation Services (JAMS) Speaker on the definition of effective notice. San Francisco and Los

Angeles, CA, June 2000.



International Risk Management Institute Past Expert Commentator on Crisis and Litigation Communications. www.irmi.com.

The American Bankruptcy Institute Journal (ABI)

Past Contributing Editor – Beyond the Quill. www.abi.org.

#### **BACKGROUND**

Ms Finegan's past experience includes working in senior management for leading Class Action Administration firms including The Garden City Group ("GCG") and Poorman-Douglas Corp., ("EPIQ"). Ms. Finegan co-founded Huntington Advertising, a nationally recognized leader in legal notice communications. After Fleet Bank purchased her firm in 1997, she grew the company into one of the nation's leading legal notice communication agencies.

Prior to that, Ms. Finegan spearheaded Huntington Communications, (an Internet development company) and The Huntington Group, Inc., (a public relations firm). As a partner and consultant, she has worked on a wide variety of client marketing, research, advertising, public relations and Internet programs. During her tenure at the Huntington Group, client projects included advertising (media planning and buying), shareholder meetings, direct mail, public relations (planning, financial communications) and community outreach programs. Her past client list includes large public and privately held companies: Code-A-Phone Corp., Thrifty-Payless Drug Stores, Hyster-Yale, The Portland Winter Hawks Hockey Team, U.S. National Bank, U.S. Trust Company, Morley Capital Management, and Durametal Corporation.

Prior to Huntington Advertising, Ms. Finegan worked as a consultant and public relations specialist for a West Coast-based Management and Public Relations Consulting firm.

Additionally, Ms. Finegan has experience in news and public affairs. Her professional background includes being a reporter, anchor and public affairs director for KWJJ/KJIB radio in Portland, Oregon, as well as reporter covering state government for KBZY radio in Salem, Oregon. Ms. Finegan worked as an assistant television program/promotion manager for KPDX directing \$50 million in programming. She was also the program/promotion manager at KECH-22 television.

Ms. Finegan's multi-level communication background gives her a thorough, hands-on understanding of media, the communication process, and how it relates to creating effective and efficient legal notice campaigns.



#### **MEMBERSHIPS, PROFESSIONAL CREDENTIALS**

**APR** The Universal Board of Accreditation Public Relations Society of America – Accredited.

- Member of the Public Relations Society of America
- Member Canadian Public Relations Society

#### **SOCIAL MEDIA**

LinkedIn: www.linkedin.com/in/jeanne-finegan-apr-7112341b

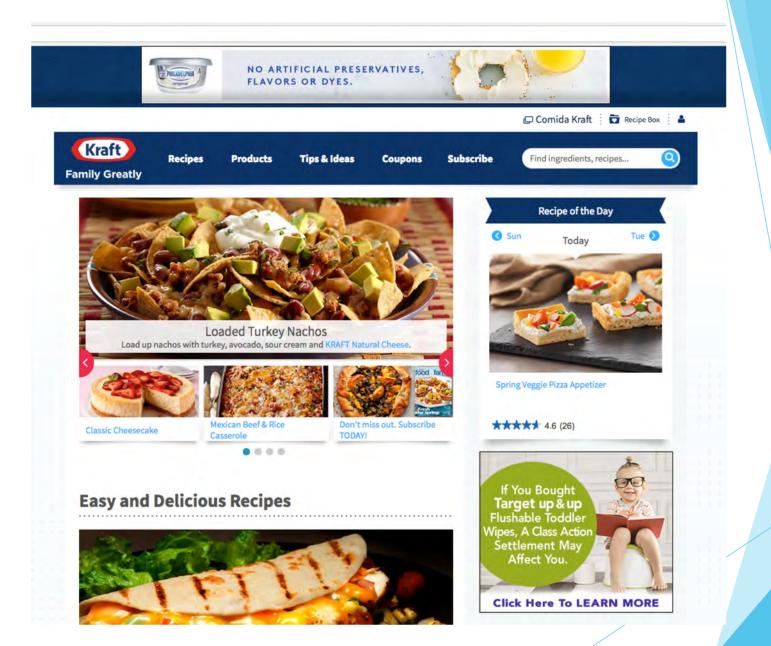
# Exhibit B



# Target up & up Wipes

Screenshots

# Case: 4:14-cv-00832-DCN Doc #: 176-1 Filed: 07/27/18 38 of 64. PageID #: 9213 Kraftrecipes.com – 300 x 250



Case: 4:14-cv-00832-DCN Doc #: 176-1 Filed: 07/27/18 39 of 64. PageID #: 9214

people.com - 728 x 90



NEWS ROYALS WATCH PEOPLETY PHOTOS STYLE SUBSCRIBE





If you bought Target up & up Flushable Toddler Wipes, A Class Action Settlement May Affect You.



Click Here To **LEARN MORE** 

**HOME - NEWS** 

## News



Dwayne Johnson Claps Back at DJ Khaled's Oral Sex Comment: I Master 'ALL Performances'



This 'Plastic Surgery Enthusiast' Wants His Nose Fixed on the New Season of Botched



Queen and Adam Lambert Headed to Las Vegas for 10-Date Limited Engagement



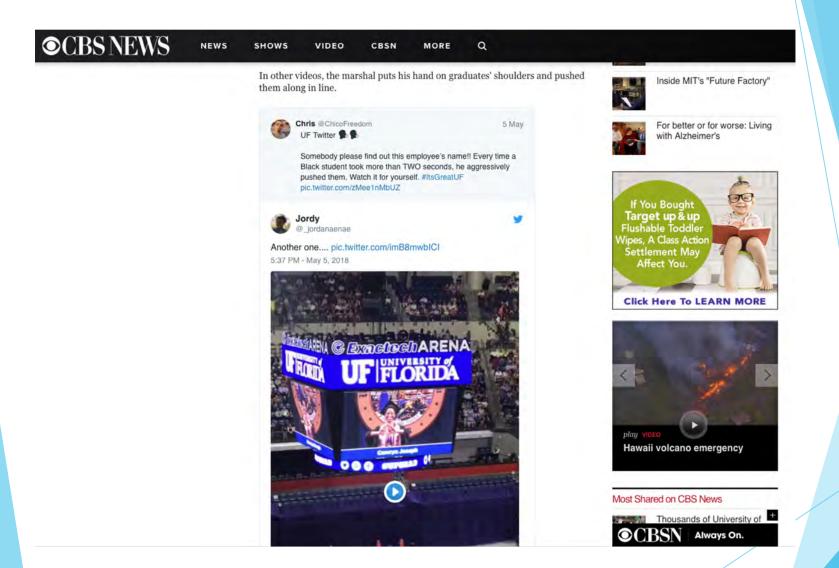






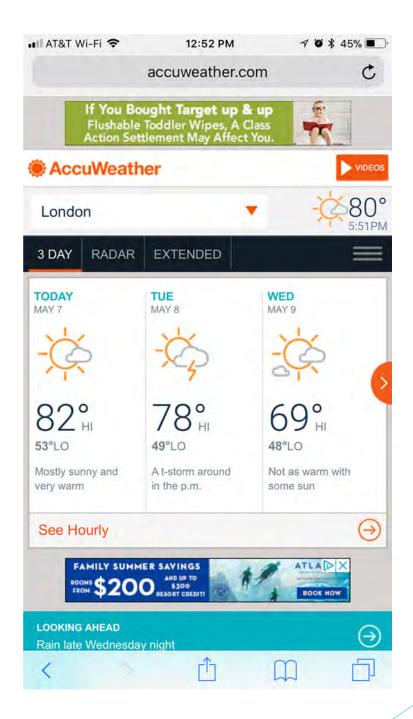


## Case: 4:14-cv-00832-DCN Doc #: 176-1 Filed: 07/27/18 40 of 64. PageID #: 9215 cbsnews.com – 300 x 250





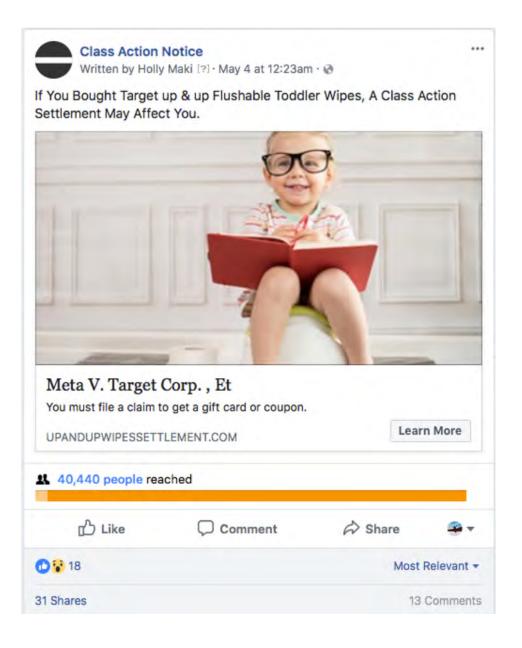
# Case: 4:14-cv-00832-DCN Doc #: 176-1 Filed: 07/27/18 41 of 64. PageID #: 9216 m.accuweather.com – 320 x 50





#### Case: 4:14-cv-00832-DCN Doc #: 176-1 Filed: 07/27/18 42 of 64. PageID #: 9217

## Facebook - Desktop Newsfeed





# Case: 4:14-cv-00832-DCN Doc #: 176-1 Filed: 07/27/18 43 of 64. PageID #: 9218 Instagram – Desktop





If You Bought Target up & up Flushable Toddler Wipes, A Class Action Settlement May Affect You.

tmarie336 @mz.a.n.ray

suse2u\_ @andyoumaysayimadreamer

Q Q	
14 likes	
3 DAYS AGO	
Add a comment	

# Exhibit C

News in Focus

**Business & Money** 

Science & Tech

Lifestyle & Health

Policy & Public Interest

People & Culture

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## Target Corporation up & up Toddler Wipes Class Action Settlement Preliminarily Approved

NEWS PROVIDED BY

Spangenberg, Shibley, & Liber LLP and Tycko & Zavareei LLP →

09:17 ET

CLEVELAND, May 4, 2018 /PRNewswire/ -- The following statement is being issued by Spangenberg, Shibley, & Liber LLP and Tycko & Zavareei LLP regarding the Target Corporation up & up flushable toddler wipes class action settlement.

#### If you purchased Target up & up flushable toddler wipes, a class action settlement may affect your rights.

A proposed nationwide class action settlement concerning Target up & up flushable toddler wipes has been preliminarily approved by a federal court in the Northern District of Ohio. The case is known as *Meta v. Target Corp.*, 4:14-cv-00832 (N.D. Ohio).

#### What is this lawsuit about?

The lawsuit claims that certain up & up flushable toddler wipes manufactured by Target Corporation and Nice-Pak Products, Inc. were not "flushable." Target denies these claims, and the court has not decided who is right or who is wrong. Instead the parties have agreed to settle this case to resolve the matter.

#### Who is included in the settlement?

The class includes people who reside in the United States and bought up & up flushable toddler wipes at any U.S. Target Store from April 18, 2010 through October 31, 2014. The wipes involved in this settlement were under the "Buckeye" product line, which was discontinued on October 31, 2014. These claims do not relate to any up & up flushable wipes sold after October 31, 2014, including the current product.

#### What does the settlement provide?

Eligible class members who file a valid claim without a proof of purchase may be eligible to receive a gift card or coupon for a capped amount based on amounts purchased. The cap for the gift cards is no more than 20 units at \$1.35 per unit (up to \$27). The cap for coupons is 20. Eligible class members who file a valid claim with a proof of purchase may be eligible to receive gift cards or coupons for up & up wipes packs, based on the amount purchased, with no cap. If class members have proof of purchase for more than 20 units, they may receive either a gift card for \$1.35 per unit, or 20 coupons for the first 20 purchases and a gift card in the amount of \$1.35 for each additional purchase.

#### What are my rights?

Class members have the right to make a claim, to object to the settlement, to opt-out of the settlement, or to do nothing. To receive a payment, class members must submit a claim, either online or by mail, to the administrator. The claim deadline is September 3, 2018. The opt-out and objection deadline is July 5, 2018. A fairness hearing has been set

for August 7, 2018, at the United States District Court for the Northern District of Ohio, 801 West Superior Avenue, Cleveland, Ohio 44113, to consider whether to approve the settlement and a request for attorneys' fees, costs, and expenses to be paid by the settlement. The request for attorneys' fees will be posted on the settlement website once it is filed. For more information or to file a claim, please go to: www.upandupwipessettlement.com, or call 1-888-878-1989.

SOURCE Spangenberg, Shibley, & Liber LLP and Tycko & Zavareei LLP

Related Links

http://www.upandupwipessettlement.com

## Target Corporation up & up Toddler Wipes Class Action Settlement Preliminarily Approved

English PR Newswire ID: 2117628-1 Clear Time May 04, 2018 9:17 AM ET

#### Overview

**TOTAL PICKUP** 227

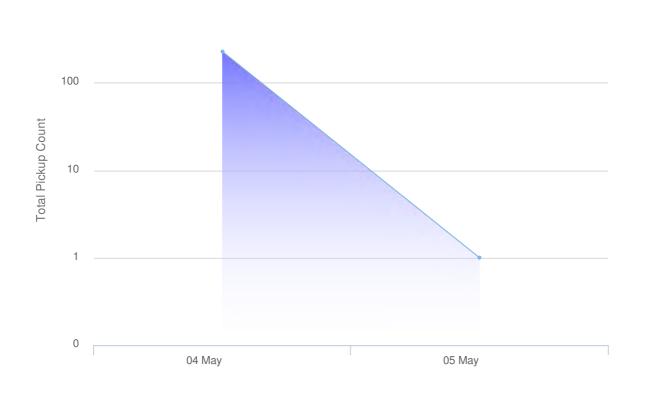
TOTAL POTENTIAL AUDIENCE 82.3M

Exact Match	226 Postings
Twitter	1 Tweet

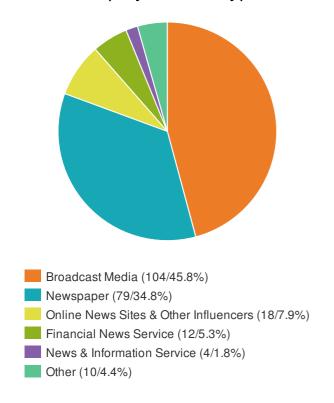
Exact Match	82.2M Visitors/Day
Twitter	94.2K Followers

## **Total Pickup Over Time**

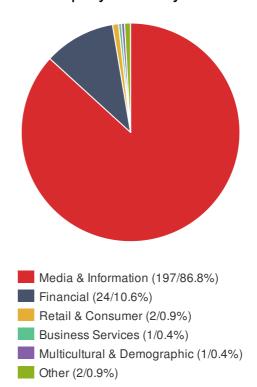
Total pickup since your content was distributed 1000







#### Total Pickup by Industry



### **Exact Match Pickup**

Exact matches are full text postings of your content which we have found in the online and social media that we monitor. Understand how it is calculated. Your release has generated **226** exact matches with a total potential audience of **82,202,270**.

Logo	Outlet Name	Location	Source Type	Industry	Potential Audience
YAHOO! FINANCE	Yahoo! Online ☐ View Release	Global	Portal	Media & Information	65,604,000 visitors/day
MARKETS I <b>nsider</b>	Business Insider: Markets Insider Online 🖵 View Release	United States	Online News Sites & Other Influencers	Financial	1,600,000 visitors/day
Market Watch	MarketWatch Online ☐ View Release	United States	Financial News Service	Financial	633,000 visitors/day
Seeking Alpha <sup>CC</sup>	Seeking Alpha Online ☐ View Release	United States	Financial News Service	Financial	475,000 visitors/day
Wichita Business Journal	Wichita Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day

## Case: 4:14-cv-00832-DCN Doc #: 176-1 Filed: 07/27/18 49 of 64. PageID #: 9224

BusinessJournal	Washington Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Business Journal	Minneapolis / St. Paul Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Those Bones Jone	Triangle Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
THE BUSINESS JOURNAL MADE THE SHAREST PRINTED THAT THE SHAREST PRINTED THE SHAREST PRINTED THAT THE SHAREST PRINTED THE SHAREST PRINTED THAT THE SHAREST PRINTED THE SHAREST PRI	Business Journal of the Greater Triad Area Online 🖵 View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Büsiness Journal	Tampa Bay Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Št Lous <mark>Besinds</mark> Johnil	St. Louis Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
South Florida BUSINESS JOURNAL	South Florida Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Business Journal	Puget Sound Business Journal Online   ✓ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
SLICOFVALEY/SHI 2006 BUSINESS OUT TO	San Jose Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
B <mark>usiness Times</mark>	San Francisco Business Times Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
BUSINESS JOURNAL PRE ESSENTIAL RESINESS TOOL	San Antonio Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Business Journal	Sacramento Business Journal Online   View Release	United States	Newspaper	Media & Information	275,000 visitors/day
bizjournals*	Bizjournals.com, Inc. Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Business Journal	Portland Business Journal Online  View Release	United States	Newspaper	Media & Information	275,000 visitors/day
BUSINESSTIMES	Pittsburgh Business Times Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day

## Case: 4:14-cv-00832-DCN Doc #: 176-1 Filed: 07/27/18 50 of 64. PageID #: 9225

Business Journal	Business Journal of Phoenix Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
BÜSİNESS JOURNAL	Philadelphia Business Journal Online 🖵 View Release	United States	Newspaper	Media & Information	275,000 visitors/day
PACIFIC BUSINESS NEWS	Pacific Business News Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
B <mark>usiness Journal</mark>	Orlando Business Journal Online 🖵 View Release	United States	Newspaper	Media & Information	275,000 visitors/day
NEW YORK BUSINESS JOURNAL	New York Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Vastrille Business Journal	Nashville Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Business Journal	Business Journal of Greater Milwaukee Online  View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Menphis Business Journal	Memphis Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Business First	Business First of Louisville Online  View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Los Angeles Business - E	Los Angeles Business from bizjournals Online 🖵 View Release	United States	Newspaper	Media & Information	275,000 visitors/day
BUSINESS OURNAL	Kansas City Business Journal Online   ✓ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Business Journal	Jacksonville Business Journal Online 🖵 View Release	United States	Newspaper	Media & Information	275,000 visitors/day
BUSINESS JOURNAL	Houston Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Business Journal	Denver Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
BUSINESSJOURNAL	Dayton Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day

## Case: 4:14-cv-00832-DCN Doc #: 176-1 Filed: 07/27/18 51 of 64. PageID #: 9226

Dallas Business Journal	Dallas Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
BUSINESS FIRST	Business First of Columbus Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Business Courier	Cincinnati Business Courier Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
CHICAGO BUSINESS JOURNAL	Chicago Business News [Chicago, IL] Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
BUSINESSJOURNAL	Charlotte Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Business First Refer the two finites throught	Business First of Buffalo Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
<mark>Duston Dusiness Journal</mark>	Boston Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
BUSINESS JOURNAL	Birmingham Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
Bushessloomal	Baltimore Business Journal Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
NS/88/UNI	Austin Business Journal Online   ✓ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
ATLANTA BUSINESS CHRONICLE	Atlanta Business Chronicle Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
BUSINESSWEEKLY	New Mexico Business Weekly Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
BUSINESS REVIEW MINIO BET 1501-120-14, 40178	Business Review (Albany) Online ☐ View Release	United States	Newspaper	Media & Information	275,000 visitors/day
	Morningstar Online ☐ View Release	Canada	Financial Data, Research & Analytics	Financial	152,000 visitors/day

## Case: 4:14-cv-00832-DCN Doc #: 176-1 Filed: 07/27/18 52 of 64. PageID #: 9227

ADVFN Deutschland	ADVFN Germany Online ☐ View Release	Germany	Financial News Service	Financial	115,000 visitors/day
PR Newswire	PR Newswire Online  View Release	United States	PR Newswire	Media & Information	100,000 visitors/day
Vittsburgh Post-Gazette post-gazetie com	Pittsburgh Post-Gazette [Pittsburgh, PA] Online ☐ View Release	United States	Newspaper	Media & Information	84,000 visitors/day
NEWSOK (1902) PI II JUJUSSE 19 DVET BEF BREIJESE	Oklahoman [Oklahoma City, OK] Online ☐ View Release	United States	Newspaper	Media & Information	53,000 visitors/day
count on first	WBBH-TV NBC-2 [Fort Myers, FL] Online ☐ View Release	United States	Broadcast Media	Media & Information	43,000 visitors/day
wisi ()	WISTV-TV NBC-10 [Columbia, SC] Online □ View Release	United States	Broadcast Media	Media & Information	42,000 visitors/day
3 KMOV Imosoon	KMOV-TV CBS-4 [St. Louis, MO] Online ☐ View Release	United States	Broadcast Media	Media & Information	38,000 visitors/day
()SOGOTRADE	SOGOTRADE Online ☐ View Release	United States	News & Information Service	Financial	36,000 visitors/day
LIVE 105 NEWS	WCSC-TV CBS-5 [Charleston, SC] Online ☐ View Release	United States	Broadcast Media	Media & Information	34,000 visitors/day
FOX 12	KPTV-TV FOX-12 [Beaverton, OR] Online □ View Release	United States	Broadcast Media	Media & Information	33,000 visitors/day
NEWS NOW	KHNL-TV NBC-8 [Honolulu, HI] Online ☐ View Release	United States	Broadcast Media	Media & Information	33,000 visitors/day
3) Watucom On SOJ, SO	WBTV-TV CBS-3 [Charlotte, NC] Online □ View Release	United States	Broadcast Media	Media & Information	32,000 visitors/day
NW INC.	WFMZ-TV IND-69 [Allentown, PA] Online □ View Release	United States	Broadcast Media	Media & Information	31,000 visitors/day
NewsOn6.com	KOTV-TV CBS-6 [Tulsa, OK] Online ☐ View Release	United States	Broadcast Media	Media & Information	31,000 visitors/day
WAVE	WAVE-TV NBC-3 [Louisville, KY] Online ☐ View Release	United States	Broadcast Media	Media & Information	30,000 visitors/day

(S)O WAFB	WAFB CBS-9 (Baton Rouge, LA) Online    View Release	United States	Broadcast Media	Media & Information	26,000 visitors/day
News9.com	KWTV-TV CBS-9 [Oklahoma City, OK] Online ☐ View Release	United States	Broadcast Media	Media & Information	26,000 visitors/day
NEWS STANDS FOR KANSAS CITY	KCTV-TV CBS-5 [Kansas City, MO] Online ☐ View Release	United States	Broadcast Media	Media & Information	26,000 visitors/day
NOW MAKE	KOLD-TV CBS-13 [Tucson, AZ] Online    View Release	United States	Broadcast Media	Media & Information	25,000 visitors/day
WLOX #13	WLOX-TV ABC-13 [Biloxi, MS] Online ☐ View Release	United States	Broadcast Media	Media & Information	24,000 visitors/day
WAFF.COM	WAFF-TV NBC-48 [Huntsville, AL] Online ☐ View Release	United States	Broadcast Media	Media & Information	24,000 visitors/day
FOI P	WXIX-TV FOX-19 [Cincinnati, OH] Online ☐ View Release	United States	Broadcast Media	Media & Information	23,000 visitors/day
BENZINGA the trading dee network	Benzinga Online → View Release	United States	Online News Sites & Other Influencers	Financial	21,000 visitors/day
WSFA12 News	WSFA-TV NBC-12 [Montgomery, AL] Online   ✓ View Release	United States	Broadcast Media	Media & Information	21,000 visitors/day
NEW 2	KSLA-TV CBS-12 [Shreveport, LA] Online   ✓ View Release	United States	Broadcast Media	Media & Information	21,000 visitors/day
dh Daly Herald	Daily Herald [Chicago, IL] Online ☐ View Release	United States	Newspaper	Media & Information	21,000 visitors/day
wmctv.com	WMC-TV NBC-5 [Memphis, TN] Online ☐ View Release	United States	Broadcast Media	Media & Information	19,000 visitors/day
12	WWBT-TV NBC-12 [Richmond, VA] Online ☐ View Release	United States	Broadcast Media	Media & Information	19,000 visitors/day
OX 5 KVVU-TV	KVVU-TV FOX-5 [Las Vegas, NV] Online ☐ View Release	United States	Broadcast Media	Media & Information	19,000 visitors/day

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TOLEON News wor	WTOL-TV CBS-11 [Toledo, OH] Online ☐ View Release	United States	Broadcast Media	Media & Information	18,000 visitors/day
WBRC FOX 6 NEWS	WBRC-TV FOX-6 [Birmingham, AL] Online ☐ View Release	United States	Broadcast Media	Media & Information	17,000 visitors/day
WALLESS - DURANN - APPETITYALE	WRAL-TV CBS-5 [Raleigh, NC] Online ☐ View Release	United States	Broadcast Media	Media & Information	17,000 visitors/day
Townhalls Finghte	Townhall Finance Online 🖵 View Release	United States	Financial News Service	Media & Information	17,000 visitors/day
The source of the state of the	Tamar Securities Online ☐ View Release	United States	Online News Sites & Other Influencers	Financial	17,000 visitors/day
Financial	FinancialContent - PR Newswire Online 🖵 View Release	United States	Financial News Service	Media & Information	17,000 visitors/day
rrstar.com	Rockford Register Star [Rockford, IL] Online ☐ View Release	United States	Newspaper	Media & Information	17,000 visitors/day
Value Investing News Invisio present discinstrations	Value Investing News Online ☐ View Release	United States	Financial News Service	Financial	17,000 visitors/day
Daily Penny Alerts	Daily Penny Alerts Online ☐ View Release	United States	Online News Sites & Other Influencers	Financial	17,000 visitors/day
Participant Education Center	Benefit Plans Administrative Services Online ☐ View Release	United States	Online News Sites & Other Influencers	Financial	17,000 visitors/day
Herald	Boston Herald [Boston, MA] Online □ View Release	United States	Newspaper	Media & Information	17,000 visitors/day
1st Discount Brokerage Claus House Rids (20)	1st Discount Brokerage Online ☐ View Release	United States	Financial News Service	Financial	17,000 visitors/day
KHQNQG HD Right Now	KHQ-TV NBC-6 [Spokane, WA] Online ☐ View Release	United States	Broadcast Media	Media & Information	17,000 visitors/day
MERRILL EDGE	Merrill Edge Online ☐ View Release	United States	Financial News Service	Financial	16,000 visitors/day
NEWS.COM	WMBF-TV NBC-32 [Myrtle Beach, SC] Online ☐ View Release	United States	Broadcast Media	Media & Information	16,000 visitors/day

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WECT 6	WECT-TV NBC-6 [Wilmington, NC] Online ☐ View Release	United States	Broadcast Media	Media & Information	16,000 visitors/day
14 NEWS	WFIE-TV NBC-14 [Evansville, IN] Online □ View Release	United States	Broadcast Media	Media & Information	16,000 visitors/day
tickertech.com	Ticker Technologies Online ☐ View Release	United States	Financial News Service	Financial	15,000 visitors/day
MS NEWS NOW may, mad	WLBT-TV NBC-3 [Jackson, MS] Online ☐ View Release	United States	Broadcast Media	Media & Information	15,000 visitors/day
WALB O	WALB-TV NBC-10 [Albany, GA] Online ☐ View Release	United States	Broadcast Media	Media & Information	14,000 visitors/day
TKLTV.	KLTV-TV ABC-7 [Tyler, TX] Online   View Release	United States	Broadcast Media	Media & Information	14,000 visitors/day
Joresboro, AR	KAIT ABC-8 (Jonesboro, AR) Online ☐ View Release	United States	Broadcast Media	Media & Information	14,000 visitors/day
WBOC 16	WBOC-TV CBS-16 [Salisbury, MD] Online □ View Release	United States	Broadcast Media	Media & Information	13,000 visitors/day
kake com	KAKE-TV ABC [Wichita, KS] Online   View Release	United States	Broadcast Media	Media & Information	13,000 visitors/day
CEVELAND 010 NEWS	WOIO-TV CBS-19 [Cleveland, OH] Online ☐ View Release	United States	Broadcast Media	Media & Information	13,000 visitors/day
088 com	KFMB-TV CBS-8 [San Diego, CA] Online ☐ View Release	United States	Broadcast Media	Media & Information	13,000 visitors/day
KPLC	KPLC-TV NBC-7 [Lake Charles-Lafayette, LA] Online ☐ View Release	United States	Broadcast Media	Media & Information	13,000 visitors/day
Heartland NEWS	KFVS-TV CBS-12 [Cape Girardeau, MO] Online ☐ View Release	United States	Broadcast Media	Media & Information	13,000 visitors/day
WTOCI	WTOC-TV CBS-11 [Savannah, GA] Online ☐ View Release	United States	Broadcast Media	Media & Information	12,000 visitors/day
WDAM-TV unic summing at	WDAM-TV NBC-7 [Hattiesburg-Laurel, MS] Online □ View Release	United States	Broadcast Media	Media & Information	10,000 visitors/day

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One News Page 🐧	One News Page Global Edition Online    View Release	Global	News & Information Service	Media & Information	10,000 visitors/day
WHE I NEW ORLEANS	WVUE-TV FOX-8 [New Orleans, LA] Online ☐ View Release	United States	Broadcast Media	Media & Information	10,000 visitors/day
REWS	WRCB-TV NBC-3 [Chattanooga, TN] Online ☐ View Release	United States	Broadcast Media	Media & Information	9,000 visitors/day
wfmj.//com	WFMJ-TV NBC-21 [Youngstown, OH] Online ☐ View Release	United States	Broadcast Media	Media & Information	8,000 visitors/day
2 NEWS	KTVN-TV CBS-2 [Reno, NV] Online ☐ View Release	United States	Broadcast Media	Media & Information	8,000 visitors/day
NEWSCHAME	KCBD-TV NBC-11 [Lubbock, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	8,000 visitors/day
HBC	WVIR-TV NBC-29 [Charlottesville, VA] Online ☐ View Release	United States	Broadcast Media	Media & Information	7,000 visitors/day
NEWS 25	KXXV-TV ABC-25 [Waco, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	7,000 visitors/day
WTVM 0 NEWS LEADER	WTVM-TV ABC-9 [Columbus, GA] Online ☐ View Release	United States	Broadcast Media	Media & Information	6,000 visitors/day
Newschannel O	KFDA-TV CBS-10 [Amarillo, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	6,000 visitors/day
KITV &	KITV-TV ABC [Honolulu, HI] Online ☐ View Release	United States	Broadcast Media	Media & Information	5,000 visitors/day
spoke	Spoke Online ☐ View Release	United States	News & Information Service	Business Services	4,000 visitors/day
KRGV.com  BURGERS BURGERS RUSHER RUSH	KRGV-TV ABC-5 [Weslaco, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	4,000 visitors/day
CROSSROADS TODAY	KAVU-TV ABC-25 [Victoria, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	4,000 visitors/day
SKTRE OF NACHEODOLS	KTRE-TV ABC-9 [Lufkin, TX] Online   View Release	United States	Broadcast Media	Media & Information	3,000 visitors/day

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/ZVN-TV ABC-7 [Fort Myers, FL]	United	Broadcast Media	Media &	2 000 viole == /=
nline 🖵 View Release	States	2.0000000000000000000000000000000000000	Information	3,000 visitors/day
/ICU-TV NBC-12 / WSEE-TV CBS-35 [Erie, A] Inline - View Release	United States	Broadcast Media	Media & Information	3,000 visitors/day
/SIL-TV ABC-3 [Carterville, IL] Inline ☐ View Release	United States	Broadcast Media	Media & Information	2,000 visitors/day
/AND-TV NBC-17 [Decatur, IL] Inline ☐ View Release	United States	Broadcast Media	Media & Information	2,000 visitors/day
WES-TV NBC-9 [Midland, TX] nline ☑ View Release	United States	Broadcast Media	Media & Information	2,000 visitors/day
ULR-TV NBC-8 [Billings, MT] Inline 🖵 View Release	United States	Broadcast Media	Media & Information	2,000 visitors/day
OAM-TV CBS-7 [Pittsburg, KS] Inline 🖵 View Release	United States	Broadcast Media	Media & Information	2,000 visitors/day
yMotherLode.com [Sonora, CA] Inline 🖵 View Release	United States	Newspaper	Media & Information	2,000 visitors/day
ewsBlaze nline ⋤ View Release	United States	Online News Sites & Other Influencers	Media & Information	1,420 visitors/day
quities.com Inline 🖵 View Release	United States	News & Information Service	Financial	1,000 visitors/day
/FLX-TV FOX-29 [West Palm Beach, FL] Inline ☐ View Release	United States	Broadcast Media	Media & Information	1,000 visitors/day
FD-TV [Nashville, TN] Inline 🖵 View Release	United States	Broadcast Media	Media & Information	1,000 visitors/day
our Hometown Lima Stations [Lima, OH] Inline 🖵 View Release	United States	Broadcast Media	Media & Information	1,000 visitors/day
/LNE-TV ABC-6 [Providence, RI]	United States	Broadcast Media	Media & Information	1,000 visitors/day
/ICZ-TV FOX-40 [Binghamton, NY]	United States	Broadcast Media	Media & Information	1,000 visitors/day
	A] nline  View Release  SIL-TV ABC-3 [Carterville, IL] nline  View Release  VAND-TV NBC-17 [Decatur, IL] nline  View Release  WES-TV NBC-9 [Midland, TX] nline  View Release  ULR-TV NBC-8 [Billings, MT] nline  View Release  OAM-TV CBS-7 [Pittsburg, KS] nline  View Release  OAM-TV CBS-7 [Pittsburg, KS] nline  View Release  PView Release  SymotherLode.com [Sonora, CA] nline  View Release  PView Release  FLX-TV FOX-29 [West Palm Beach, FL] nline  View Release  FD-TV [Nashville, TN] nline  View Release  Dur Hometown Lima Stations [Lima, OH] nline  View Release  FLX-TV ABC-6 [Providence, RI] nline  View Release	A]  nline  View Release  SIL-TV ABC-3 [Carterville, IL]  nline  View Release  View Release  AND-TV NBC-17 [Decatur, IL]  nline  View Release  WES-TV NBC-9 [Midland, TX]  nline  View Release  ULR-TV NBC-8 [Billings, MT]  nline  View Release  ULR-TV NBC-8 [Billings, MT]  nline  View Release  United States  United States  United States  United States  United States  View Release  United States  View Release  United States  View Release  United States  FLX-TV FOX-29 [West Palm Beach, FL]  Nime  View Release  FLX-TV FOX-29 [West Palm Beach, FL]  View Release  FD-TV [Nashville, TN]  nline  View Release  United States  FD-TV [Nashville, TN]  nline  View Release  United States  United States  View Release  United States  United States  United States  FLX-TV FOX-29 [West Palm Beach, FL]  United States  United States  United States  United States  United States	A]  Infline □ View Release  SIL-TV ABC-3 [Carterville, IL]  Infline □ View Release  AND-TV NBC-17 [Decatur, IL]  Infline □ View Release  WES-TV NBC-9 [Midland, TX]  Infline □ View Release  WES-TV NBC-9 [Midland, TX]  Infline □ View Release  ULR-TV NBC-8 [Billings, MT]  Infline □ View Release  ULR-TV NBC-8 [Billings, MT]  Infline □ View Release  ULR-TV NBC-9 [Midland, TX]  Infline □ View Release  ULR-TV NBC-9 [Midland, TX]  Infline □ View Release  United States  Broadcast Media  CAM-TV CBS-7 [Pittsburg, KS]  Infline □ View Release  United States  Newspaper  Infline □ View Release  United States  Online News Sites & Other Influencers  And Other Influencers  Infline □ View Release  United States  PEX-TV FOX-29 [West Palm Beach, FL]  Infline □ View Release  United States  Broadcast Media  FD-TV [Nashville, TN]  Infline □ View Release  United States  Broadcast Media  Infline □ View Release  Infline □ View Release  United States  Broadcast Media  Infline □ View Release   Al niline	

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6	KAUZ-TV CBS-6 [Wichita Falls, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	1,000 visitors/day
KNDO-KNOU Right Now	KNDO-TV NBC / KNDU-TV NBC [Kennewick, WA] Online   View Release	United States	Broadcast Media	Media & Information	1,000 visitors/day
The Chronicle Journal	The Chronicle Journal [Thunder Bay, ON] Online 🖵 View Release	Canada	Newspaper	Media & Information	1,000 visitors/day
<b>P</b> NEWS	KSWO-TV ABC-7 [Lawton, OK] Online ☐ View Release	United States	Broadcast Media	Media & Information	1,000 visitors/day
6/2 FOX	KEYC-TV CBS-12 / FOX-12 [Mankato, MN] Online	United States	Broadcast Media	Media & Information	1,000 visitors/day
FOX 54	WFXG-TV FOX-54 [Augusta, GA] Online ☐ View Release	United States	Broadcast Media	Media & Information	850 visitors/day
Globe <b>Advisor</b> .com	Globe Advisor Online ☐ View Release	Canada	Newspaper	Financial	
Axcess News	Axcess News Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information	
3 We	360WiseNews Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information	
1stCounsel	1stCounsel Online ☐ View Release	United States	Online News Sites & Other Influencers	Policy & Public Interest	
WNKY40	WNKY-TV NBC-40 / CBS-40 [Bowling Green, KY] Online ☐ View Release	United States	Broadcast Media	Media & Information	
FOX KVHP	KVPH-TV FOX-29 [Lake Charles, LA] Online ☐ View Release	United States	Broadcast Media	Media & Information	
WBC8	WBCB-TV CW-21 (Youngstown, OH) Online □ View Release	United States	Broadcast Media	Media & Information	
ORGOLFE	Our Good Life Online ☐ View Release	United States	Blog-Parental Influencers	Retail & Consumer	
TELEMINOO	Telemundo Lubbock [Lubbock, TX] Online □ View Release	United States	Broadcast Media	Media & Information	

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TELEMINO	Telemundo Amarillo [Amarillo, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	
Don't know and the	SWX Right Now [Spokane, WA] Online  View Release	United States	Broadcast Media	Media & Information	
TO TO A PARTIE OF THE PARTIE O	Telemundo-20 [Midland, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	
SNI	SNJ Today [Millville, NJ] Online ☐ View Release	United States	Broadcast Media	Media & Information	
969	96.9-FM Rock FM [Lubbock, TX] Online 🖵 View Release	United States	Broadcast Media	Media & Information	
PROFIT QUOTES	ProfitQuotes Online ☐ View Release	United States	Financial News Service	Financial	
One News Page	One News Page Unites States Edition Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	
	Oldies 97.7 FM [Lubbock, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	
NOTCAS	NOTICIAS ETX [Tyler, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	
NEWS CENTRAL	KNBN-TV NBC-21 [Rapid City, SD] Online □ View Release	United States	Broadcast Media	Media & Information	
my lubbockty	KMYL-TV MyLubbock-TV [Lubbock, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	
Made (1/5 5	KXTQ-FM 106.5 Magic [Lubbock, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	
LUBROCK	KLCW-TV Lubbock CW [Lubbock, TX] Online □ View Release	United States	Broadcast Media	Media & Information	
THE WARTS	WHDF-TV The Valley's CW [Huntsville, AL] Online □ View Release	United States	Broadcast Media	Media & Information	
LATIN BUSINESS TODAY	Latin Business Today Online ☐ View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	

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KUAM N EIN S	KUAM-TV NBC-8 / CBS-11 [Hagatna, Guam] Online   View Release	United States	Broadcast Media	Media & Information
FOX (Log) SINA.	KFBB-TV ABC-8 / FOX-TV [Great Falls, MT] Online    View Release	United States	Broadcast Media	Media & Information
TELEMINOO 2 AASA	KASA-TV Telemundo-2 [Albuquerque, NM] Online ☐ View Release	United States	Broadcast Media	Media & Information
JUNIATA COUNTY RADIO	Juniata County Radio Online ☐ View Release	United States	Broadcast Media	Media & Information
InvestorPoint	InvestorPoint.com Online   ✓ View Release	United States	Trade Publications	Financial
<b>50X34</b> .com	KJTV-TV FOX-34 [Lubbock, TX] Online   ✓ View Release	United States	Broadcast Media	Media & Information
DELMARVA	WBOC-TV FOX-21 [Salisbury, MD] Online ☐ View Release	United States	Broadcast Media	Media & Information
FOX 14 NEWS AT 9:00	KFJX-TV FOX-14 [Pittsburg, KS] Online ☐ View Release	United States	Broadcast Media	Media & Information
GOURLE TO SECOND PORTE DE SECO	KTTU-FM 97.3 Double T [Lubbock, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information
CityRoom WHYLCHYTOOM COM	Warren and Hunterdon Counties CityRoom [Warren County, NJ] Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information
CityRoom	El Paso CityRoom [El Paso, TX] Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information
00	KJTV-AM 950 / KJTV-FM 100.7 [Lubbock, TX] Online □ View Release	United States	Broadcast Media	Media & Information
<b>∞FOX</b> MONTANA	KTMF-TV / KWYB-TV [Missoula, MT] Online ☐ View Release	United States	Broadcast Media	Media & Information
THE THE STATE OF T	KLBB-FM 93.7 The Eagle [Lubbock, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information

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7 <b>60</b> кума	KFMB 760-AM [San Diego, CA] Online  View Release	United States	Broadcast Media	Media & Information	
VES.	KLZK-FM 107.7 YES FM [Lubbock, TX] Online    View Release	United States	Broadcast Media	Media & Information	
US Press Association	US Press Association Online   ✓ View Release	United States	Industry Association Sites	Media & Information	
BIN	IBTN9 US Online ☐ View Release	Global	Online News Sites & Other Influencers	Media & Information	
	KQCW-TV CW-12/19 [Tulsa, OK] Online ☐ View Release	United States	Broadcast Media	Media & Information	
T.U.B Investing	T.U.B Investing Online   View Release	Singapore	Blog	Financial	
FAT PITCH FINACIALS	Fat Pitch Financials Online   View Release	United States	Online News Sites & Other Influencers	Financial	
MY STLLY LITTLE CANC	My Silly Little Gang Online ☐ View Release	United States	Blog-Parental Influencers	Retail & Consumer	
Washer, bias / Corder, Inc.	Winslow, Evans & Crocker Online ☐ View Release	United States	Online News Sites & Other Influencers	Financial	
Pettinga	Pettinga Financial Online ☐ View Release	United States	Financial News Service	Financial	
PENTICTON HERALD	Penticton Herald [Penticton, BC] Online ☐ View Release	Canada	Newspaper	Media & Information	
THE DAILY COURIER	Kelowna Daily Courier [Kelowna, BC] Online    View Release	Canada	Newspaper	Media & Information	
manhattanweek.com	Manhattanweek Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information	
EVENITNESS NEWS	KLKN-TV ABC-8 [Lincoln, NE] Online ☐ View Release	United States	Broadcast Media	Media & Information	
	KFMB 100.7 FM [San Diego, CA] Online ☐ View Release	United States	Broadcast Media	Media & Information	

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HOME TEAM	KFVE-TV MyNetworkTV-5 [Honolulu, HI] Online   ☐ View Release	United States	Broadcast Media	Media & Information	
WALL STREET SELECT	Wall Street Select Online   ✓ View Release	United States	Financial News Service	Financial	
Company News	Company News Online ☐ View Release	United States	Online News Sites & Other Influencers	Financial	
NAPARONETA DAILY NEWS	Wapakoneta Daily News [Wapakoneta, OH] Online ☐ View Release	United States	Newspaper	Media & Information	
Codes Recom	Valley City Times-Record [Valley City, ND] Online ☐ View Release	United States	Newspaper	Media & Information	
The Post & Mail	The Post and Mail [Columbia City, IN] Online ☐ View Release	United States	Newspaper	Media & Information	
thepilotnews.com	The Pilot News [Plymouth, IN] Online ☐ View Release	United States	Newspaper	Media & Information	
Evening ELEADER	The Evening Leader [St. Marys, OH] Online ☐ View Release	United States	Newspaper	Media & Information	
YAMERICAN	The Antlers American [Antlers, OK] Online ☐ View Release	United States	Newspaper	Media & Information	
Sweetwater-Reporter	Sweetwater Reporter [Sweetwater, TX] Online ☐ View Release	United States	Newspaper	Media & Information	
STARKVILLE DAILY NEWS	Starkville Daily News [Starkville, MS] Online   View Release	United States	Newspaper	Media & Information	
PRESS, COM	The Daily Press [St. Marys, PA] Online ☐ View Release	United States	Newspaper	Media & Information	
<u>RIDGWAY <b>Record</b></u>	Ridgway Record [Ridgway, PA] Online ☐ View Release	United States	Newspaper	Media & Information	
***PUNXSUTAWNEYSPIRIT	The Punxsutawney Spirit [Punxsutawney, PA] Online □ View Release	United States	Newspaper	Media & Information	
SOTIAU DALLY HEWS	Poteau Daily News [Poteau, OK] Online ☐ View Release	United States	Newspaper	Media & Information	

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Observer News Enterprise www.observernewsonline.com	The Observer News Enterprise [Newton, NC] Online □ View Release	United States	Newspaper	Media & Information	
The Community Post Scring our community size, 1861	Minster Community Post [Minster, OH] Online ☐ View Release	United States	Newspaper	Media & Information	
Mammoth Times	Mammoth Times [Mammoth Lakes, CA] Online ☐ View Release	United States	Newspaper	Media & Information	
MALVERN DAILY RECORD	Malvern Daily Record [Malvern, AR] Online ☐ View Release	United States	Newspaper	Media & Information	
Kara Rapublican	The Kane Republican [Kane, PA] Online □ View Release	United States	Newspaper	Media & Information	
The Zuyo Register	Inyo Register [Bishop, CA] Online ☐ View Release	United States	Newspaper	Media & Information	
Deer Park Tribune €	The Deer Park Tribune [Deer Park, WA] Online ☐ View Release	United States	Newspaper	Media & Information	
DECATER DAILY DEMOCRATE	Decatur Daily Democrat [Decatur, IN] Online ☐ View Release	United States	Newspaper	Media & Information	
Pailų <u>Činos</u> Leader	Daily Times Leader [West Point, MS] Online ☐ View Release	United States	Newspaper	Media & Information	
BORGER NEWS-HERALD	Borger News Herald [Borger, TX] Online ☐ View Release	United States	Newspaper	Media & Information	
STAILS HONOR	Big Spring Herald [Big Spring, TX] Online ☐ View Release	United States	Newspaper	Media & Information	
THE SALINE COURIER	The Saline Courier [Benton, AR] Online □ View Release	United States	Newspaper	Media & Information	
MorningNews	The Morning News [Blackfoot, ID] Online ☐ View Release	United States	Newspaper	Media & Information	
Business Class News	BUSINESS CLASS NEWS Online  View Release	United States	Blog	Media & Information	

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